

TSD File Inventory Index

Date: September 18, 2008

Initial: CMKerecas

Facility Name: <u>Nimble Company (De Falden Site)</u>		
Facility Identification Number: <u>ILD 049 301 583</u>		
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		5. RFI QAPP

Total

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.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI QAPP Correspondence		.9 Environmental Justice	
7. [unclear]			

Note: Transmittal Letter to Be Included with Reports.

Comments: *see folder site.*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
RECORD CENTER

FEB 5 1997

January 8, 1997

REPLY TO THE ATTENTION OF:

NIMLOCK COMPANY
ATTN: DAVE EVENSEN
7420 LEHIGH
NILES, IL 60714

This is in response to your letter of 10/19/96 regarding
the following installation:

U.S. EPA ID NUMBER: **ILD049301583**
LOCATION OF INSTALLATION: **7420 LEHIGH**
NILES, IL 60714

According to the information submitted, you have indicated that this facility is no longer in need of the U.S. EPA ID number. Your ID number has been coded as an inactive number. DO NOT USE this number without re-notifying the U.S. EPA of your activity.

If you have any questions or need further assistance, please contact me at (312) 886-6173.

Sincerely,

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

Enclosure

cc: State Agency
File



Printed on Recycled Paper

New Owner

0312010003

Please print or type with ELITE (type 12 characters per inch) in the unshaded areas only.

Form Approved OMB No. 2050-0029 Expires 5-97

Please refer to the Instructions for Filling Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

RECEIVED
Date Received
(For Official Use Only)
DEC 02 1996
U. S. EPA, REGION V

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification
(Complete Item C)

C. Installation's EPA ID Number

ILD049301583

II. Name of Installation (Include company and specific site name)

NIMLOK COMPANY

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

68200 W 2000 7420 LEHIGH

Street (Continued)

City or Town

NILES

State

Zip Code

IL 60714-

County Code

County Name

031 COOK

IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

SAME

City or Town

State

Zip Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (Last)

(First)

EVENSEN

DAVE

Job Title

Phone Number (Area Code and Number)

VP MFG

847-647-1012

VI. Installation Contact Address (See Instructions)

A. Contract Address
Location Mailing Other

B. Street or P.O. Box

☒
☐
☐

7420 LEHIGH

City or Town

NILES

State

Zip Code

IL 60714-

VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

GERALD PERUTZ

Street, P.O. Box, or Route Number

City or Town

State

Zip Code

Phone Number (Area Code and Number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)

847-647-1012

Yes

No

Month Day Year

RCRISENTRY JAN 06 1997

RECEIVED

NOV 21 1996

IEPA/DLPC

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes: Refer to instructions)

A. Hazardous Waste Activity

1. Generator (See instructions)
☐ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (200-2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes
- Mode of Transportation
☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify
3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions.
4. Hazardous Waste Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Boiler and/or Industrial Furnace
☐ 1. Smelter Deferral
☐ 2. Small Quantity Exemption
 Indicate Type of Combustion Device(s)
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
5. Underground Injection Control

NON-HANDLER

B. Used Oil Recycling Activities

1. Used Oil Fuel Marketer
☐ a. Marketer Directs Shipment of Used Oil to Off-Specification Burner
☐ b. Marketer Who First Claims the Used Oil Meets the Specifications
2. Used Oil Burner - Indicate Type(s) of Combustion Device(s)
☐ a. Utility Boiler
☐ b. Industrial Boiler
☐ c. Industrial Furnace
3. Used Oil Transporter - Indicate Type(s) of Activity(ies)
☐ a. Transporter
☐ b. Transfer Facility
4. Used Oil Processor/Re-refiner - Indicate Type(s) of Activity(ies)
☐ a. Process
☐ b. Re-refine

IX. Description of Hazardous Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. (Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles: See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☐ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (List specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33; See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number: See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature

Dave Evenesen

Name and Official Title (Type or print)

Dave Evenesen VP Mfg

Date Signed

10/19/96

XI. Comments

We will not be disposing of hazardous waste. please
make this federal # inactive Thank you

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILD049301583

INSTALLATION ADDRESS

CROUSE HINDS CO
7420 LEHIGH AVE
NILES

IL 60648

IL

EPA Form 8700-12B (4-80)

02/18/82

MAILED: DATE 3-1-82



ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• IL0049301543

INSTALLATION ADDRESS

CROUSE HINDS CO
7420 LEHIGH AVE
MILFORD

IL 60648

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

ILDO49301583

PA
date
may

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

F 1 L D 0 4 9 3 0 1 5 8 3

T/A C
1

1 2 3 4 5 6 7 8 9 10 11 12

I. NAME OF INSTALLATION

CCR O, U S E H I N D S C O L I G H T I N G P R O D U C T S D I V

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 7 4 2 0 L E H I G H A V E N U E

CITY OR TOWN

ST.

ZIP CODE

4 N I L E S

I L 6 0 6 4 8

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 7 4 2 0 L E H I G H A V E N U E

CITY OR TOWN

ST.

ZIP CODE

6 N I L E S

I L 6 0 6 4 3

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 J R T H O M A S P L A N T M A N A G E R

3 1 2 - 7 7 4 - 1 2 0 0

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 C R O U S E H I N D S C O M P A N Y

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

I L D 0 4 9 3 0 1 5 8 3

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

OCT 31 1980

I.D. - FOR OFFICIAL USE ONLY													
5												T/A	1
W												13	14

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 1 7				
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

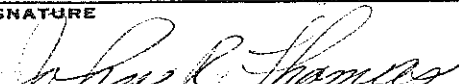
☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE 	NAME & OFFICIAL TITLE (type or print) JOHN R. THOMAS PLANT MGR.	DATE SIGNED 10-31-80
--	--	-------------------------

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER										APPROVED		DATE RECEIVED (yr., mo., & day)							
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
F 1 L D 0 4 9 3 0 1 5 8 3										T/A C		8 1 0 0 8 1 5							

I. NAME OF INSTALLATION

C R O U S E - H I N D S C O . L I G H T I N G P R O D U C T S D I V

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 7 4 2 0 L E H I G H A V E N U E

CITY OR TOWN

ST.

ZIP CODE

4 N I L E S I L 6 0 6 4 8

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 7 4 2 0 L E H I G H A V E N U E

CITY OR TOWN

ST.

ZIP CODE

6 N I L E S I L 6 0 6 4 8

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2 J R T H O M A S P L A N T M A N A G E R 3 1 2 - 7 7 4 - 1 2 0 0

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 C R O U S E H I N D S C O M P A N Y

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F - FEDERAL
M - NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☐ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. - FOR OFFICIAL USE ONLY													
3													T/A C
W													1
1	2											13	14 15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 0 1	F 0 1 7				
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary. None.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary. None.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
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23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary. None.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.) None.

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE (type or print)	DATE SIGNED
John R. Thomas	J. R. THOMAS PLANT MGR.	8-14-1980

PA to Enforcement
CROUSE-HINDS COMPANY



Lighting Products Division
7420 Lehigh Avenue
Chicago, Illinois 60648
312/774-1200

1LD049301583 PA date only 11-14-80
October 31, 1980

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Dear Sir:

When we sent the EPA Form 8700-12, "NOTIFICATION OF Hazardous Waste Activity" prior to August 18, 1980, under Section VI "Type of Hazardous Waste Activity", we placed an "x" in the box for "Generation" only.

We have since determined that it will be necessary to store our hazardous waste for more than ninety (90) days.

A revised form is attached, changing Section VI to include Box "A" Generation and Box "C" Treat/Store/Dispose.

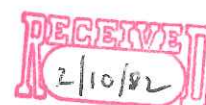
Note, Also that on our original report we failed to put an M in the box for type of ownership.

We are presently preparing Part A forms 1 and 3 for submittal to obtain a permit for generation and storage.

Sincerely,

J.R. Thomas
Plant Manager

Crouse-Hinds Co.
Lighting Products Division
7420 N. Lehigh Avenue
Niles, IL 60648



nimlok

DISPLAY AND EXHIBIT SYSTEMS

October 22, 1996

0312010003
Cook-Co *Santerr*

RECEIVED
NOV 18 1996

Sile

PROGRAM MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA - REGION 5



Mr. James Pierce
Division of Land Pollution
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, IL 62794-9276

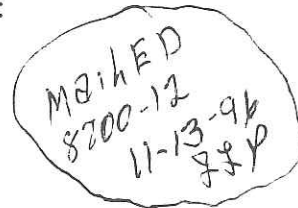
Re: Generator Identification Number 0312010003
for 7420 N. Lehigh Ave., Niles, IL 60714

Dear Mr. Pierce:

IL D049301583

The purpose of this correspondence is to inform your agency that a change in ownership has occurred for the above referenced facility. The facility ownership currently on file is under Crouse-Hinds Company. The new owner of the facility is:

Nimlok Company
6019 W. Howard St.
Niles, IL 60714-4801



As agent for Nimlok Company, MTI Construction has applied for the removal of a 10,000 gallon heating oil tank located on the property. There may be some special waste material generated from this activity, which will require off-site disposal.

Please note the ownership change in your records. Contact Mark Pierski of MTI Construction at (847) ~~647-1012~~ if you have any questions.
827-8700

Yours truly,

Scott Thompson
Chief Financial Officer

RECEIVED
WMD RECORD CENTER

DEC 18 1996

ST/cmk

RECEIVED

NOV 13 1996

FORM 1 GENERAL	 EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION Consolidated Permits Program (Read the "General Instructions" before starting.)	EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px; display: inline-block;"> FL D 0 4 9 3 0 1 5 8 2 </div>
II. POLLUTANT CHARACTERISTICS <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.</p> </div>		GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.	

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1	SKIP	CROUSE HINDS COMPANY
---	------	----------------------

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 THOMAS JOHN PLANT MANAGER	312 774 1200

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		
3 7420 N LEHIGH AVE		
B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 NILES	IL	60648

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER				
5 7420 N LEHIGH AVE				
B. COUNTY NAME	C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
COOK	NILES	IL	60648	

VII. SIC CODES (4-digit, in order of priority)

A. FIRST										B. SECOND									
C		(specify)								C		(specify)							
7		3, 6, 4, 8 Outdoor area and flood-lighting and poles								7									
15		16				19				15		16				19			
C. THIRD										D. FOURTH									
C		(specify)								C		(specify)							
7										7									
15		16				19				15		16				19			

A. NAME															B. Is the name listed in Item VIII-A also the owner?														
CROUSE HINDS COMPANY															<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO														
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															D. PHONE (area code & no.)														
F = FEDERAL					M = PUBLIC (other than federal or state)					P (specify)					<input type="checkbox"/> 315 <input type="checkbox"/> 477 <input type="checkbox"/> 7000														
S = STATE					O = OTHER (specify)																								
P = PRIVATE																													
E. STREET OR P.O. BOX																													
POST OFFICE BOX 4999																													
F. CITY OR TOWN															G. STATE					H. ZIP CODE					IX. INDIAN LAND				
SYRACUSE															NY					13221					Is the facility located on Indian lands?				
																									<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)																																																	
C	T	I																		C	T	I																																					
9	N																			9	P																																						
15	16	17	18															30	15	16	17	18															30																						
B. UIC (Underground Injection of Fluids)																				E. OTHER (specify)																																							
C	T	I																		C	T	I																		(specify)																			
9	U																			9																																							
15	16	17	18															30	15	16	17	18															30																						
C. RCRA (Hazardous Wastes)																				E. OTHER (specify)																																							
C	T	I																		C	T	I																		(specify)																			
9	R		A T T A C H E D																	9																																							
15	16	17	18															30	15	16	17	18															30																						

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

Electrical distribution equipment and control manufacturing.

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE <i>(type or print)</i>	B. SIGNATURE	C. DATE SIGNED
Robert K. McCabe V.P. & Gen. Mgr., Ltg. Prod. Div.		11-14-80

FORM 3 RCRA		U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.)	EPA I.D. NUMBER														
			S	F	I	L	D	0	4	9	3	0	1	5	8	3	T/A
			13 14 15														

FOR OFFICIAL USE ONLY														
APPLICATION APPROVED					DATE RECEIVED (yr., mo., & day)					COMMENTS				
23					24					25				

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used: Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS		T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:			OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)		
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S										T/A										C																			
C										DUP										1																			
1 2										13 14 15										16 17 18 19										20 21 22 23 24 25 26 27 28 29 30 31 32									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY										FOR OFFICIAL USE ONLY														
		1. AMOUNT (specify)					2. UNIT OF MEASURE (enter code)								1. AMOUNT					2. UNIT OF MEASURE (enter code)																			
X-1	S 0 2	600					G						5																										
X-2	T 0 3	20					E						6																										
1	S 0 1	3300					G						7																										
													8																										
													9																										
3																																							
4													10																										
16 17 18 19										27										28 29 30 31 32																			

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

<u>ENGLISH UNIT OF MEASURE</u>	<u>CODE</u>	<u>METRIC UNIT OF MEASURE</u>	<u>CODE</u>
POUNDS.....	P	KILOGRAMS.....	K
TONS.....	T	METRIC TONS.....	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARDOUS WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

CONTINUE ON REVERSE

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)**E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.**

EPA I.D. NO. (enter from page 1)

S	F	I	L	D	0	4	9	3	0	1	5	8	3	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	2	0	0	5	9	1
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, & seconds)

0	8	7	4	6	3	5	3
72	73	74	75	76	77	78	79

VIII. FACILITY OWNER☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

C	E																				
17	18											55	56	57	58	59	60	61	62	63	64

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

C	F											C	G										
19	20											45	46	47	48	49	50	51	52	53	54		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

Robert K. McCabe
V.P. & Gen. Mgr., Ltg. Prod. Div.

B. SIGNATURE



C. DATE SIGNED

11-14-80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

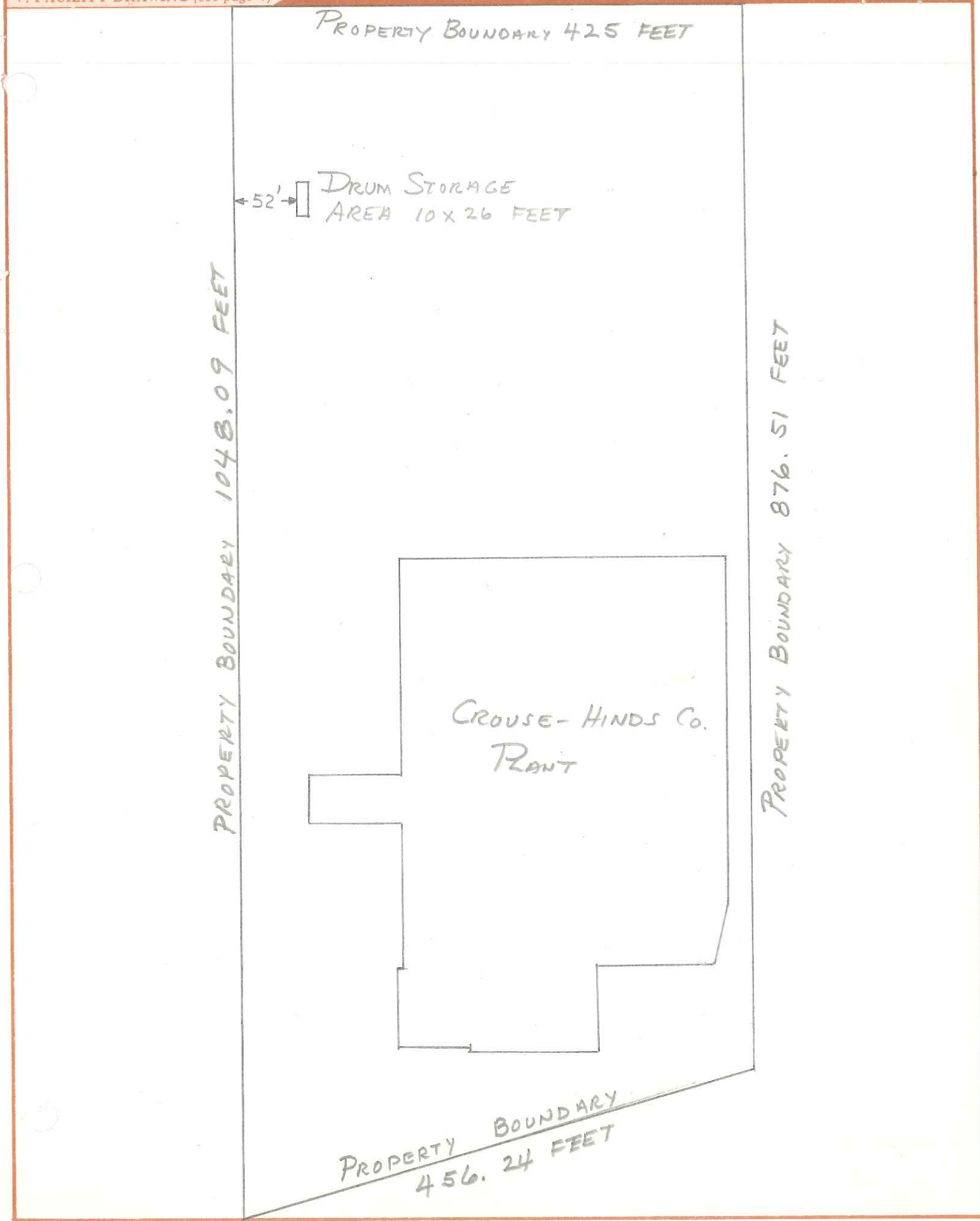
7/16

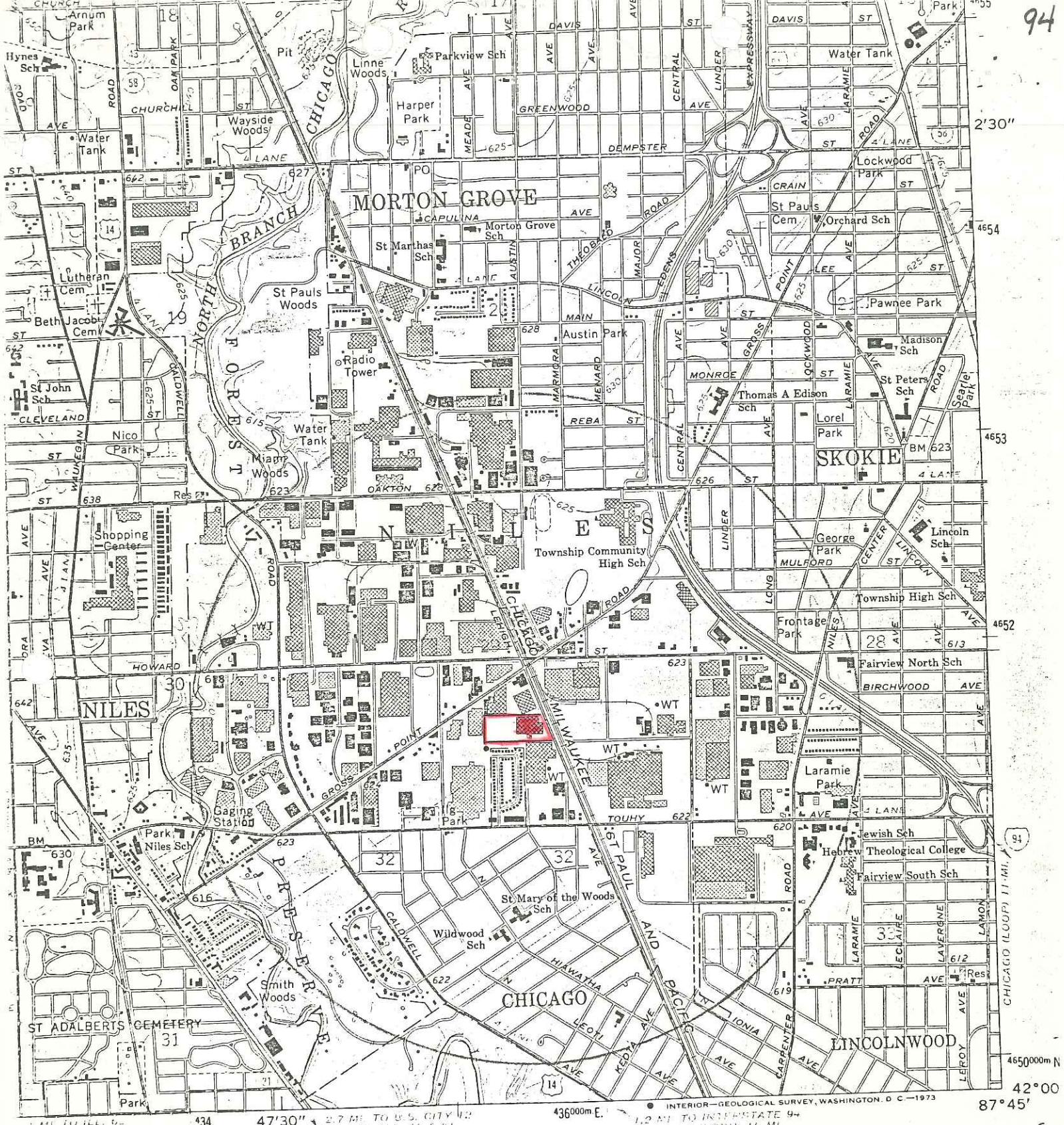


7/16



V. FACILITY DRAWING (see page 4)





1 MILE
5000 6000 7000 FEET
1 KILOMETER

ILLINOIS

QUADRANGLE LOCATION

Revisions shown in purple compiled from aerial photographs taken 1972. This information not field checked

ROAD CLASSIFICATION

Heavy-duty	Light-duty
Medium-duty	Unimproved dirt
Interstate Route	U.S. Route
State Route	

PARK RIDGE, ILL.
N4200—W8745/7.5

1963
PHOTOGRAPHED 1972



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-JCK-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. EPA ID #: ILD049301583

CROUSE-HINDS CO LIGHTING PRODUCT
2700 RIVEER RD SUITE 308
DES PLAINES IL 60018

RE: Hazardous Waste Permit Application

Dear Permit Applicant:

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status" (or the State program equivalent), while complying with applicable technical and record-keeping standards.

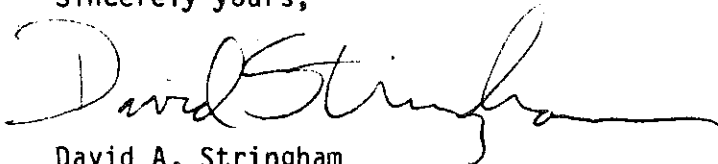
On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2 (or the State regulation equivalent).

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Please mail your response to the following:

RCRA Activities
Region V
P. O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

Sincerely yours,

A handwritten signature in cursive script, reading "David Stringham".

David A. Stringham
Chief, Solid Waste Branch

Enclosure



CROUSE-HINDS LIGHTING

January 31, 1986

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RCRA Activities
Region V
P. O. Box A3587
Attention: ATKJG
Chicago, IL 60690

We recently received the enclosed letter and form from David A. Stringham, Chief, Solid Waste Branch. The site has been closed. See the attached November 7, 1983 letter from Lawrence W. Eastep. In addition this property at 7420 Lehigh Avenue, Niles, Illinois was sold to the WAREHOUSE CLUB in the spring of 1983.

Sincerely,

A handwritten signature in blue ink that reads 'Vernon R. Bishop'.

Vernon R. Bishop, Manager
Division Engineering

VRB/mhf

Attachments



Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 03120103 -- Cook County
Niles/Crouse-Hinds Lighting
ILD049301583 *PAGITSD*

November 7, 1983

Crouse-Hinds Lighting
R.K. McCabe, Vice President
Post Office Box 4999
Syracuse, New York

Dear Mr. McCabe:

The closure plans submitted by Richard Walker, undated and received by this Agency on October 24, 1983, to close the hazardous waste storage area are hereby approved. The approval of these plans is further subject to the following modifications and conditions:

Certification that the above-referenced site had been closed in accordance with the approved closure plan by the owner/operator, R.K. McCabe, Vice-President, and an independent registered professional engineer of Illinois, Jerald R. Gers, P.E., was received at this Agency April 29, 1983.

Therefore, this Agency concurs that the hazardous waste storage site at Crouse-Hinds Lighting is closed in accordance with the referenced closure plans and in accordance with the Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265).

Very truly yours,

Lawrence W. Eastep
Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

SAS
LWE:SAS:dks/8357c, 4

cc: Northern Region
USEPA Region V
Jerald R. Gers, P.E.
Division File
Financial Assurance Unit

RECEIVED
NOV 15 1983
WASTE MANAGEMENT
BRANCH

RECEIVED
11/21/83



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
5HW

SEP 8 1983

Mr. Richard Walker
Manager Facilities Engineering
Crouse - Hinds Lighting
P. O. Box 4999
Syracuse, New York 13221

Re: Closure of Crouse-Hinds
hazardous waste storage facility
in Niles, Illinois, ILD 049301583

Dear Mr. Walker:

Closure of your company's hazardous waste storage facility at 7420 Lehigh Avenue, Niles, Illinois, does not require approval of the United States Environmental Protection Agency. The Illinois Environmental Protection Agency (IEPA) was delegated Phase I authority to conduct their hazardous waste management program in lieu of the federal program on May 17, 1982. Therefore, the Niles facility is subject only to the closure provisions found at 35 Illinois Administrative Code Part 725. 40 CFR Part 265 no longer applies in Illinois. When you have satisfied the Illinois requirements, IEPA will advise this office and we will revise our records accordingly.

If you have any questions on this matter, please call me at (312) 886-6151.

Sincerely,

A handwritten signature in cursive script, reading "Robert L. Stone", is written over the typed name.

Robert L. Stone
State Implementation Officer

cc: Thomas Cavanagh, IEPA



CROUSE-HINDS LIGHTING

RECEIVED

AUG.
25 1983

WASTE MANAGEMENT BRANCH
EPA, REGION V

August 15, 1983

Mr. Robert Stone
U. S. Environmental Protection Agency
Region V RCRA Activities
P. O. Box A-3587
Chicago, Illinois 60690

LD 049 301 583 PA, G, TSD

Dear Mr. Stone:

Through a phone conversation with Diane Parker from your offices, I learned that the U. S. EPA had not been informed by the State of Illinois EPA of our request for closure approval for our Niles, Illinois hazardous waste storage facility.

I have enclosed copies of our correspondence with the Illinois EPA as evidence of our compliance with closure certification regulations.

The building has since been sold and is being operated by another company. We have been waiting for a formal approval of the closure from both the Illinois and United States Environmental Protection Agencies. Please let me know the status of the approval.

Very truly yours,

Richard Walker CPE
Manager Facilities Engineering

RW:lm
Enclosure

RECEIVED
8/26/83



CROUSE-HINDS LIGHTING

April 22, 1983

Mr. Thomas Cavanagh
Manager, Permits Branch
Illinois Environmental Protection Agency
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Cavanagh:

In conformance of Subpart G, Title 40 CFR, Part 265.115, certification for closure is submitted for the Cooper/Crouse-Hinds Company hazardous waste storage facility at 7420 Lehigh Avenue, Niles, Illinois. Our EPA identification number is ILD049301583.

It is our certification that said closure has been conducted in accordance with the closure plan submitted to the Illinois Environmental Protection Agency at Springfield, Illinois on September 21, 1982.

The outside storage area shows no evidence of hazardous waste spill or contamination. The equipment within the factory that generated the hazardous waste has been cleaned. All hazardous wastes have been shipped to a disposal site using procedures which conform with DOT and EPA regulations.

A letter of certification from an independent professional engineer, Metcalf and Eddy, Inc., of Des Plaines, Illinois, is enclosed.

We believe these documents fulfill the requirements for closure and respectfully request formal approval from the Illinois Environmental Protection Agency and from the United States Environmental Protection Agency.

Very truly yours,

A handwritten signature in cursive script, appearing to read "W. M. Tuck".

William M. Tuck
General Manager
Lighting Products Division

A handwritten signature in cursive script, appearing to read "R. K. McCabe".

R. K. McCabe
Vice President
Commercial Electrical Prod.

/fa
Enclosures



Metcalfe & Eddy, Inc.
Engineers & Planners

April 4, 1983



1011 East Touhy Avenue
Des Plaines, Illinois 60018
(312) 298-5070

Mr. Richard Walker
Crouse Hinds Company
7546 Morgan Road
Liverpool, New York 13088

Subject: Certification of Closure of Hazardous Waste Storage
Facility in Niles, Illinois

Dear Mr. Walker:

On March 31, 1983, I toured the Crouse Hinds Company Facility at 7420 N. Lehigh Avenue in Niles, Illinois, to determine whether the approved "Hazardous Waste Management Closure Plan" had been complied with. I inspected the hazardous waste storage area as well as the plant and site in general.

There were no hazardous wastes remaining in the storage area at the time of my inspection. In addition, I did not detect hazardous wastes stored in other parts of the plant or site.

Being a Registered Professional Engineer in the State of Illinois, Certificate No. 62-34942, I hereby certify that the hazardous waste storage area at the Crouse Hinds Company, Niles, Illinois plant has been closed in accordance with the specifications in the approved closure plan, as required in CFR 265.115, "Certification of Closure".

Very truly yours,

Jerald Gers, P.E.
Illinois, Certificate No. 62-34942
Senior Project Engineer

Charles E. Pound
Illinois, Certificate No. 62-040732
Regional Vice President

DEC 14 1982

Withdrawal of Compliance Order V-W-82-R-030 Issued to Crouse-Hinds Company, EPA ID# ILD 049301583

William H. Miner, Chief
Technical, Permits, and Compliance Section

Mary A. Gade
Office of Regional Counsel

On September 30, 1982, Region V issued a Compliance Order to Crouse-Hinds Company of Niles, Illinois, for failure to notify the U.S. EPA of its hazardous waste activity.

At an informal settlement conference held on November 22, 1982, Messrs. Eddie Scott and Richard Walker of Crouse-Hinds Company presented evidence which indicated Crouse-Hinds Company submitted a timely notification.

After the above meeting, copies of Crouse-Hinds' documentation were given to Versar for processing. Subsequently, Versar located a notification file for Crouse-Hinds containing a timely notification and subsequent modified notification.

Therefore, I request that Office of Regional Counsel withdraw the Crouse-Hinds Company Compliance Order.

cc: Swanson

5HW-TUB:S.SWANSON:ad 12/8/82

INITIALS	DATE	TYPIST	AUTHOR	PEU CHIEF	STU #1 CHIEF	STU #2 CHIEF	TPS CHIEF	WMB CHIEF	AHMD DIRECTOR
			SKS 12-10-82		12/10/82		12/13/82		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

Office of Administrative Law Judges

Mail Code A-110

December 6, 1982

OFFICE OF
THE ADMINISTRATOR

Eddie E. Scott, Esq.
Crouse-Hinds Company
7420 North Lehigh Avenue
Niles, Illinois 60648

Mary A. Gade, Esq.
Office of Enforcement Counsel
Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

RECEIVED

DEC 13 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

Subject: Crouse-Hinds Company, Docket No. V-W-82-R-030

Dear Counsellors:

As you have previously been informed, the undersigned has been designated to preside at the subject proceeding under Section 3008 of the Solid Waste Disposal Act, as amended (42 U.S.C. 6928).

Section 22.18(a) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits (40 CFR Part 22) sets forth Agency policy concerning settlements and the parties may be attempting to settle this matter. Counsel for Complainant is directed to file a statement on or before December 30, 1982 as to whether this matter has been or will be settled. If this matter is not settled by that date, I propose to accomplish some of the purposes of a prehearing conference by this letter as permitted by Section 22.19(e) of the Rules of Practice.

Accordingly, the parties are directed to accomplish the following prehearing exchange:

By Complainant and Respondent

1. Furnish desired or required place for the hearing (see Sections 22.19(d) and 22.21(d) of the Rules of Practice).

2. To the extent not covered by specific requests below, furnish a list of expected witnesses, a summary of their anticipated testimony and a copy of each exhibit or document intended to be offered in evidence at the hearing.

By Complainant

Furnish summary of evidence to support allegations in Paragraph 5 of complaint that on or after November 19, 1980, Respondent stored hazardous wastes without having a permit or without having achieved interim status as required by the Act.

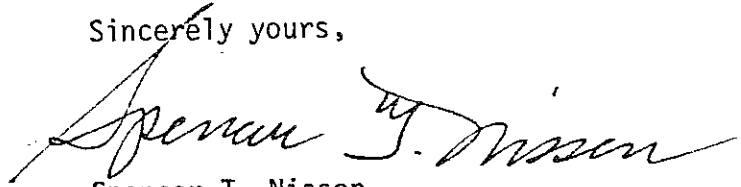
By Respondent

Furnish copy of notification of hazardous waste activity allegedly filed by August 18, 1980, and copy of Part A permit application filed on November 14, 1980.

Responses to this letter will be furnished to the Regional Hearing Clerk, to the other party and to the undersigned on or before January 17, 1983.

Upon receipt and review of the responses, a determination will be made as to whether further correspondence would serve any useful purpose or whether this matter should be set for hearing without further delay.

Sincerely yours,


A handwritten signature in cursive script, appearing to read "Spencer T. Nissen".

Spencer T. Nissen
Administrative Law Judge

CERTIFICATE OF SERVICE

This is to certify that the original of this Letter, dated December 6, 1982, was mailed to the Regional Hearing Clerk, Region V, and a copy was mailed to the addressees.

December 6, 1982

A handwritten signature in cursive script, reading "Helen F. Handon". The signature is written in dark ink and is positioned above the printed name and title.

Helen F. Handon
Secretary

RCRA ENFORCEMENT ACTION SIGN-OFF

PART I. BACKGROUND

FACILITY NAME CROUSE HINDS CO
 FACILITY LOCATION NILES
 RCRA ID NUMBER ILD049301503
 NATURE OF VIOLATION late notification

PART II. RECOMMENDATION

ISSUE CO ? CAFO

NAME & DATE OF STATE CONTACT NOTIFIED _____

ANY OTHER OUTSTANDING ENFORCEMENT ACTIONS AGAINST THIS FACILITY:

WATER- _____

AIR _____

OTHER _____

PART III. CONCURRENCES

	INITIALS	DATE	AGREE	DISAGREE
PREPARER TECHNICAL	SKS	9(22)82	(✓)	()
LEGAL		()	()	()
CHIEF, STATE TECHNICAL UNIT	grh for HW	9(23)82	(✓)	()
CHIEF, TP&C SECTION	WAM	9(24)82	(✓)	()
CHIEF, WASTE MANAGEMENT BRANCH	XKX	9(24)82	(✓)	()

PART IV. APPROVAL

DIRECTOR, WASTE MANAGEMENT DIVISION

APPROVES (✓)

DISAPPROVES ()

cc: Section Inspection Log
 ORC

Generic Order, Class II



COOPER INDUSTRIES

RECEIVED
NOV 26 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

November 24, 1982

Ms. Mary Gade
Attorney
United States Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

Re: Compliance Order and Consent Agreement - Crouse-Hinds Company -
ILD 049301583
(Our Ref: SC 40.1)

Dear Ms. Gade:

Thank you for the courtesy extended to me and Richard Walker of our Crouse-Hinds Company subsidiary during our meeting with you and Ms. Sally Swanson Monday, November 22, 1982.

We understand there is nothing further required from us to resolve this matter. The document copies we left with you show that the required notification was made August 14, 1980 prior to the August 18, 1980 deadline and that inadvertent clerical errors in the original notification were corrected by Mr. J. R. Thomas' October 31, 1980 letter and the additional form submittal.

Sincerely,

Eddie E. Scott
Patent and Trademark Counsel

EES/djk

cc: Richard Walker - Crouse-Hinds
Sally Swanson - EPA

COOPER INDUSTRIES, INC.

First City Tower, Suite 4000, P.O. Box 4446
Houston, Texas 77210
(713) 739-5400

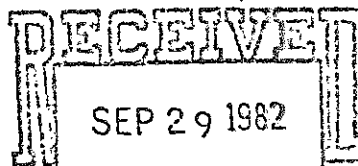


UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

SEP 30 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

C. T. Corporation System
Registered Agent for
Crouse Hinds Company
208 South La Salle Street.
Chicago, Illinois 60604



REPLY TO ATTENTION OF:

REGIONAL HEARING CLERK SHW - TUB
U.S. ENVIRONMENTAL
PROTECTION AGENCY

N-W- 82 R-030

Re: Compliance Order and Consent Agreement
Crouse Hinds Company
ILD 049301583

Dear Sir:

Enclosed please find a Compliance Order which specifies this Agency's determination of certain violations by your company of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. 6901 et seq.; based on information in our files about your facility at 7420 N. Lehigh Avenue, Niles, Illinois. The Compliance Order states the reasons for such a determination. In essence the facility does not have a permit and has not achieved interim status under Section 3005 of RCRA because a timely notification of hazardous waste activity under Section 3010 of RCRA was not filed with EPA. This Compliance Order is issued pursuant to Section 3008 of RCRA (42 U.S.C. 6928).

Accompanying the Compliance Order is a Notice of Opportunity for Hearing. Should you desire to contest the Compliance Order, a written request for a hearing is required to be filed with Regional Hearing Clerk within 30 days from receipt of this Compliance Order. A copy of your hearing request should be sent to Ms. Mary A. Gade, Office of Regional Counsel, U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604. Also enclosed is a Consent Agreement and Final Order. Should you agree to this settlement, please sign it and return it to the person named below.

The proposed settlement in this administrative action will allow you to continue to operate your facility subject to the conditions of the Final Order. The Agency believes that it will be in the public interest to allow your facility to continue to operate subject to the Order's conditions even though your facility has failed to achieve interim status under Section 3005(e) of RCRA. Entry of this Order does not grant your facility interim status, but the Agency will refrain from further enforcement action and the facility will be allowed to operate if the Order's conditions are complied with until a final determination is made on your permit application pursuant to 40 CFR 122. The Order does not protect against action by a third party.

If you have any questions or desire to request an informal conference, for the purpose of settlement, please contact Ms. Sally K. Swanson, Waste Management Division, 111 West Jackson Boulevard, Chicago, Illinois 60604, at (312) 886-7482.

Sincerely,



Basil G. Constantelos
Director, Waste Management Division

Enclosures

cc: Robert Kuykendall, Manager
Division of Land/Noise Pollution Control
Illinois Environmental Protection Agency

Phil Parenti, Chief
Environmental Control Division
Illinois Attorney General's Office

Robert K. McCabe, Vice President & General Manager
Lighting Products Division
Crouse Hinds Company

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF)

Crouse Hinds Company)

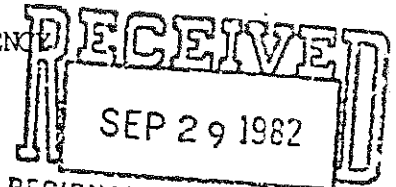
7420 N. Lehigh Avenue)

Niles, Illinois 60648)

EPA ID NO. ILD049301583)

DOCKET NO. V-W-82-R-

COMPLAINT

V-W REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL
PROTECTION AGENCYCOMPLAINT

This Complaint is filed pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act, (RCRA), 42 U.S.C. 6928(a)(1), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director, Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter USEPA). The Respondent is the Crouse Hinds Company.

Based upon information available to USEPA, it has been initially determined that the Respondent is in violation of certain requirements of RCRA. Specifically, Respondent has been determined to be in violation of 42 U.S.C. 6925 in that Respondent owns and operates an existing hazardous waste management facility as defined by 40 CFR 260.10 which does not have a permit or interim status. Respondent has not achieved interim status because it failed to submit a timely notification pursuant to 42 U.S.C. 6930 and as required by 42 U.S.C. 6925(e) for interim status.

DETERMINATIONS

1. Respondent owns and operates a facility located at 7420 North Lehigh Avenue, Niles, Illinois. Respondent is New York corporation whose Registered Agent in Illinois is C. T. Corporation System, 208 South LaSalle Street, Chicago, Illinois 60604.

2. Section 3005 of Subtitle C of the Act provides in part, that:

"the Administrator (of the Environmental Protection Agency) shall promulgate regulations requiring each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste identified or listed under this subtitle to have a permit issued pursuant to this Section. (After the effective date of the regulations) the treatment, storage, or disposal of any such hazardous waste is prohibited except in accordance with such a permit." Material in parenthesis added.

3. Regulations requiring each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste to have a permit issued pursuant to Section 3005 were promulgated by the Administrator on May 19, 1980, and are codified at 40 CFR Parts 122 and 124. The effective date of these regulations is November 19, 1980.

4. Section 3005(e) of the Act provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of his/her permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of the Act concerning notification of hazardous waste activity have been complied with, and (3) application for a permit has been made. This statutory authority to operate is known as interim status. USEPA regulations implementing these provisions are found at 40 CFR Part 122.

5. On or after November 19, 1980, Crouse Hinds Company has stored substances, including spent halogenated solvents, which have been identified or listed as hazardous waste under Section 3001 of the Act, 40 CFR Part 261, without a permit and without having achieved interim status, in violation of Section 3005(a) of the Act. Interim status was not achieved because Crouse Hinds Company failed to submit a notification of hazardous waste activity by August 18, 1980, as required by Section 3010(a) of the Act.

Respondent has not filed such a notification to date. A Part A permit application pursuant to 40 CFR 122.22 was filed on November 14, 1980.

6. Notwithstanding the violation of the requirements of Section 3005(a) of the Act by Respondent, the continued operation of the facility is determined to be in the public interest:

- (a) for a limited period of time until a final decision on its permit application has been made by USEPA; and
- (b) if in complete compliance with the Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, 40 CFR Part 265; and
- (c) if in complete compliance with the conditions set forth in this Complaint.

ORDER AND CONDITIONS
FOR CONTINUED OPERATION

Respondent having been initially determined to be in violation of 42 U.S.C. 6925, the following Compliance Order pursuant to 42 U.S.C. 6928(a) (1) is entered:

- A. Respondent shall, within 30 days of receipt of this Complaint, cease all treatment, storage or disposal of any hazardous waste except such storage at the facility as shall be in complete compliance with the Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities 40 CFR Part 265; and
- B. Respondent shall fully comply with the Consolidated Permit Regulations, 40 CFR Parts 122 and 124, as if Respondent had filed a timely "Notification of Hazardous Waste Activity" pursuant to Section 3010(a).
- C. Respondent shall file a notification of hazardous waste activity pursuant to Section 3010 of RCRA within 30 days of receipt of this order.

Notwithstanding any other provision of this Order, an enforcement action could be brought pursuant to Section 7003 of RCRA or other statutory authority should the USEPA find that handling, storage, treatment, transportation or disposal of solid waste or hazardous waste at the facility presents an imminent and substantial endangerment to human health or the environment.

NOTICE OF OPPORTUNITY FOR HEARING

The above named Respondent is hereby notified that the above Order may become final or a default Order entered upon motion unless said person has requested in writing a hearing no later than 30 days from the date this Order is served. You have the right to request a hearing, to contest any material factual allegation set forth in the Complaint or the appropriateness of any proposed compliance schedule. In the event that you wish to request a hearing, and to avoid having the Compliance Order become final without further proceedings, you must file a written answer to this Complaint with the Regional Hearing Clerk, USEPA Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within 30 days of your receipt of this notice. A copy of your answer and any subsequent document filed in this action should be sent to Office of Enforcement Counsel, Regional Counsel's Office at the same address, to the attention of Ms. Mary A. Gade. Respondent's answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has any knowledge.

Said answer should contain (1) a definite statement of the facts, circumstances or arguments which constitute the grounds of defense, and (2) a concise statement of the facts which you intend to place at issue. The denial

of any material fact or the raising of any affirmative defense shall be considered as a request for a hearing. A copy of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits accompanies this Complaint (40 CFR Part 22, 45 Federal Register 24367 April 4, 1980; as amended by 45 Federal Register 79898 December 2, 1980). These regulations are applicable to all proceedings to this administrative action including the filing of any answer.


SETTLEMENT CONFERENCE

Whether or not you request a hearing, you may confer informally, with USEPA concerning (1) whether the alleged violations in fact occurred as set forth above or (2) the appropriateness of the compliance schedule.

You may request an informal settlement conference at any time by contacting this office. However, any such request will not affect the 30 day limit for responding with an answer to this Complaint and requesting a formal hearing on the violations alleged therein. U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences.

Request for an informal conference may be made to Ms. Sally K. Swanson, at the above address, telephone number (312) 886-7482.

Signed this 27th day of September, 1982.


Basil G. Constantelos
Director, Waste Management Division
Complainant
U. S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing Complaint to be served upon the persons designated below on the date below, by causing said copies to be deposited in the U.S. Mail, First Class (certified return receipt requested, postage prepaid) at Chicago, Illinois, in envelopes addressed to:

Robert K. McCabe, Vice President
and General Manager
Crouse Hinds Company
7420 North Lehigh Avenue
Niles, Illinois 60648

C. T. Corporation System
Registered Agent for Crouse Hinds Company
208 South LaSalle Street
Chicago, Illinois 60604

I have further caused the original of the Complaint and this certification of service to be served in the office of the Regional Hearing Clerk located in the Office of Regional Counsel, USEPA, Region V, at 230 S. Dearborn Street, Chicago, Illinois 60604 on the date below.

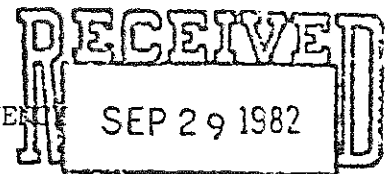
These are said persons' last known addresses to the subscriber.

Dated this 29 day of September, 1982.

for Pamela Grace
Denise Reape, Secretary
Technical, Permits and
Compliance Section

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V



REGIONAL HEARING CLERK
U.S. ENVIRONMENTAL

V-W PROTECTION AGENCY 030

IN THE MATTER OF)

Crouse Hinds Company)
7420 North Lehigh Avenue)
Niles, Illinois 60648)

EPA ID NO. ILD049301583)

DOCKET NO. V-W-82-R-

CONSENT AGREEMENT
AND
FINAL ORDER

A Complaint was filed pursuant to Section 3008(a)(1) of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act, (RCRA), 42 U.S.C. 6928(a)(1), and the Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director of the Waste Management Division, Region V, United States Environmental Protection Agency (hereinafter USEPA). The Respondent is the Crouse Hinds Company.

The parties to this action being desirous to settle this action enter into the following stipulations.

1. Respondent has been served with a copy of the Complaint with Notice of an Opportunity for a Hearing on this matter and the Regional Administrator has jurisdiction over this matter pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. 6928.

2. Respondent owns and operates an existing hazardous waste management facility as defined by 40 CFR 260.10.

3. Respondent did not submit a notification of hazardous waste activity pursuant to 42 U.S.C. 6930.

4. Respondent filed a Part A permit application with EPA for operation of a hazardous waste management facility on November 14, 1980.

5. Respondent neither admits nor denies any other allegation in the complaint.

ORDER

Based upon the foregoing stipulations, the parties agree to the entry of the following Final Order in this matter.

A. Respondent shall, within 30 days of receipt of this Complaint, cease all treatment, storage, or disposal to any hazardous waste except such storage at the facility as shall be in complete compliance with the Standards Applicable to Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities, 40 CFR Part 265; and

B. Respondent shall fully comply with the Consolidated Permit Regulations, 40 CFR Parts 122 and 124, as if Respondent had filed a timely "Notification of Hazardous Waste Activity" pursuant to Section 3010(a); and submitted Part A of a permit application as required by those regulations.

C. Respondent shall file a notification of hazardous waste activity pursuant to Section 3010 of RCRA within 30 days of receipt of this order.

Notwithstanding any other provision of this Order, an enforcement action could be brought pursuant to Section 7003 of RCRA or other statutory authority should the USEPA find that handling, storage, treatment, transportation or disposal of solid waste or hazardous waste at the facility presents an imminent and substantial endangerment to human health or the environment.

Agreed to this _____ day of _____, 1982.

Respondent

Title

Agreed to this _____ day of _____, 1982.

Basil G. Constantelos
Director, Waste Management Division
Complainant
U. S. Environmental Protection Agency
Region V

It being Agreed, it is so ORDERED this _____ day
of _____, 1982.

Valdas V. Adamkus
Regional Administrator



Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

749

312/345-9780

Refer to: 03120103 - Cook County - Niles/Crouse-Hinds Company
ILD049301583

May 7, 1982

Mr. Bob Thomas
Crouse-Hinds Company
7420 N. Lehigh Avenue
Niles, Illinois 60648

Mr. Richard Walker
Crouse-Hinds Company
P.O. Box 4999
Syracuse, N.Y. 13221

Dear Mr. Thomas:

On February 5, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of Crouse-Hinds Company in Niles, Illinois. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. During the inspection the following deficiencies were observed:

Pursuant to 40 CFR 265.15(b) the owner/operator is to establish and maintain inspection records and schedules which detail records of malfunctions, operator errors, discharges, safety and emergency equipment, security devices, and operating and structural devices. Your facility is deficient in that these inspection records and schedules had not been established as required.

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing evacuation routes and signals used to begin evacuation must be included in the contingency plan. These requirements are pursuant to 40 CFR Part 265 Subpart D. Your facility is deficient in that the contingency plan did not include 1) the home phone numbers and home addresses of those persons designated as emergency coordinators and 2) a listing of all emergency equipment available on site.

Requirements contained in 40 CFR 265.53(b) were not complied with in that copies of the contingency plan were not submitted to local emergency response organizations.


Pursuant to 40 CFR 265.73 the owner/operator must keep a written operating record at the facility. The operating record must include the following:

- 1) A description and the quantity of each hazardous waste received and the method(s) and date(s) of its treatment, storage or disposal at the facility as required by Appendix I.
- 2) The location and quantity of each hazardous waste within the facility including cross-references to specific manifest document numbers.
- 3) Records and results of waste analyses and trial tests.
- 4) Summary reports and details of all incidents that require implementation of the contingency plan.
- 5) Records and results of inspections.
- 6) Monitoring and testing data.
- 7) All closure cost estimates and for disposal facilities all post-closure cost estimates.

Your facility is deficient in that the operating record did not include those items specified in numbers 1 and 2 as stated above.

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 40 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Glenn Stenard of my staff at the above number.

Sincerely,


Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:GJS:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

date?
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Judge Spencer T. Nissen
Administrative Law Judge
U.S. Environmental Protection
Agency (A-110)
401 M. Street, S.W.
Washington, D.C. 20460

Re: Motion to Withdraw Complaint
V-W-82-R-030

Dear Judge Nissen:

In response to your Order dated December 6, 1982, the Complainant respectfully submits this statement on settlement. After a November 22, 1982 meeting of representatives of the parties to this preceeding in Chicago, Illinois, Complainant determined that the Complaint should be withdrawn. Accordingly, please find enclosed a Motion to Withdraw Complaint in the above-captioned case which I am filing on behalf of my client, Basil G. Constantelos, the Complainant in this matter. Please note that a proposed Order to Withdraw Complaint has been attached to the Motion as Exhibit F. If the Presiding Officer should decide to grant my Motion and sign the Order, this case should be withdrawn from your records.

cc: Eddie E. Scott
Regional Hearing Clerk

Sincerely,

Mary A. Gade

Mary A. Gade
Assistant Regional Counsel

REGION V

Crouse-Hinds Company
EPA ID NO. ILD 049301583

DOCKET NO. V-W-82-R-030

NOW COMES COMPLAINANT, by and through its attorney, moving the Presiding Officer to withdraw Complaint Number V-W-82-R-030 issued on September 29, 1982, to Crouse Hinds Company pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCRA) (see Exhibit A).

Crouse Hinds owns and operates a facility located at 7420 North Lehigh Avenue, Niles, Illinois (see Exhibit B). That facility stores spent halogenated solvents and spent non-halogenated solvents (see Exhibit B). Section 3010(a) of RCRA requires storers of hazardous waste to notify the United States Environmental Protection Agency (U.S. EPA) within 90 days of promulgation of regulations of such storage activity; such notifications had to be filed by August 18, 1982.

Based on information known to U.S. EPA on the date of issuance of the Complaint, Crouse Hinds had never filed a Notification of Hazardous Waste Activity; therefore, U.S. EPA issued a Complaint to Crouse Hinds, pursuant to Section 3008 of RCRA, for failure to notify (see Exhibit C). After meeting with representatives of Crouse Hinds on November 22, 1982, U.S. EPA became aware that Crouse Hinds had filed a Notification of Hazardous Waste Activity prior to August 18, 1982, in full conformance with the requirements of Section

3010(a) of RCRA (see Exhibits B and C). Crouse Hinds also filed an amended Notification of Hazardous Waste Activity, dated October 31, 1980 (see Exhibit D). The timely filing of the Notification was described in Respondent's Answer to Complaint, filed on October 26, 1982 (see Exhibit E).

Based on the foregoing, and pursuant to 40 C.F.R. §22.14(e), Complainant prays the Presiding Officer to issue the Proposed Order to Withdraw Complaint included herein as Exhibit F.

Respectfully submitted,

Mary A. Gade
Mary A. Gade
Attorney for Complainant
Office of Regional Counsel
U.S. EPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604
312/886-6668

Dated: December 30, 1982

EXHIBIT A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF

Crouse-Hinds Company
7420 N. Lehigh Avenue
Niles, Illinois 60648

EPA ID. NO. ILD049301583

DOCKET NO. V-W-82-R-

October 26, 1982

HEARING REQUEST

Respondent, Crouse-Hinds Company hereby requests a Hearing on the subject matter.

Respondent is also attempting to resolve this matter through informal conference with USEPA.

Respectfully submitted,

CROUSE-HINDS COMPANY, Respondent

By Eddie E. Scott

Eddie E. Scott
Attorney for Respondent
Cooper Industries, Inc.
P.O. Box 4446

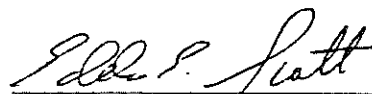
CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing Hearing Request to be served upon the persons designated below on the date below, by causing said copies to be deposited in the U.S. Mail, First Class (certified return receipt requested, postage prepaid) at Houston, Texas, in envelopes addressed to:

(1) United States Environmental Protection Agency, Region V
Office of Enforcement Counsel, Regional Counsel's Office
Attention: Ms. Mary A. Gade
230 South Dearborn Street
Chicago, Illinois 60604

(2) Regional Hearing Clerk
USEPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dated this 26 day of October, 1982.



Eddie E. Scott
Attorney for Responde

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF

Crouse-Hinds Company
7420 N. Lehigh Avenue
Niles, Illinois 60648

EPA ID. NO. ILD049301583

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DOCKET NO. V-W-82-R-

October 26, 1982

ANSWER

This answer is filed on behalf of Respondent, Crouse-Hinds Company.

1. Respondent admits it owns and operates a facility located at 7420 North Lehigh Avenue, Niles, Illinois and that it is a New York corporation whose Registered Agent in Illinois is C. T. Corporation System, 208 South LaSalle Street, Chicago, Illinois 60604.

2. Respondent admits Section 3005 of Subtitle C of the Act provides in part, that:

"the Administrator (of the Environmental Protection Agency) shall promulgate regulations requiring each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste identified or listed under this subtitle to have a permit issued pursuant to this Section. (After the effective date of the regulations) the treatment, storage, or disposal of any such hazardous waste is prohibited except in accordance with such a permit." Material in parenthesis added.

3. Respondent admits that regulations requiring each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste to have a permit issued pursuant to Section 3005 were promulgated by the Administrator on May 19, 1980, are codified at 40 CFR Parts 122 and 124, and the effective date of these regulations is November 19, 1980.

4. Respondent admits Section 3005(e) of the Act provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of his/her permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of the Act concerning notification of hazardous waste activity have been complied with, and (3) application for a permit has been made. This statutory authority

to operate is known as interim status. USEPA regulations implementing these provisions are found at 40 CFR Part 122.

5. Respondent denies that on or after November 19, 1980, Crouse-Hinds Company has stored substances, including spent halogenated solvents, which have been identified or listed as hazardous waste under Section 3001 of the Act, 40 CFR Part 261, without a permit and without having achieved Interim status, in violation of Section 3005(a) of the Act and/or that Interim status was not achieved because Crouse-Hinds Company failed to submit a notification of hazardous waste activity by August 18, 1980, as required by Section 3010(a) of the Act and/or that Respondent has not filed such a notification to date. Respondent admits a Part A permit application pursuant to 40 CFR 122.22 was filed on November 14, 1980.


Respondent did file a notification of hazardous waste activity by August 18, 1980.

6. Respondent neither denies or admits the determinations stated in paragraph 6 of the Complaint.

Respondent is interested in resolving this matter through an informal settlement conference and is pursuing informal settlement through conference with USEPA. Respondent is requesting a Hearing by a separate writing.

Respectfully submitted,

CROUSE-HINDS COMPANY, Respondent

By 

Eddie E. Scott
Attorney for Respondent
Cooper Industries, Inc.
P.O. Box 4446

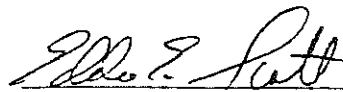
CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing Answer to be served upon the persons designated below on the date below, by causing said copies to be deposited in the U.S. Mail, First Class (certified return receipt requested, postage prepaid) at Houston, Texas, in envelopes addressed to:

(1) United States Environmental Protection Agency, Region V
Office of Enforcement Counsel, Regional Counsel's Office
Attention: Ms. Mary A. Gade
230 South Dearborn Street
Chicago, Illinois 60604

(2) Regional Hearing Clerk
USEPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dated this 26 day of October, 1982.



Eddie E. Scott
Attorney for Respondent

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BEFORE THE ADMINISTRATOR

123 049 301 73

In the Matter of

Crouse-Hinds Company,

Respondent

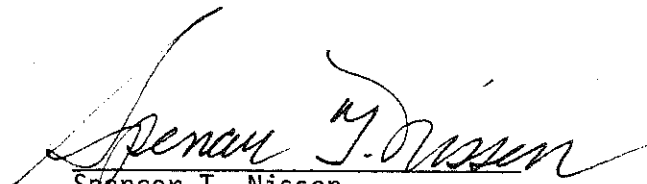
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Docket No. V-W-82-R-030

Order Dismissing Complaint

Complainant having filed the instant complaint upon the mistaken assumption that Respondent had not filed a preliminary notification of hazardous waste activity pursuant to Sec. 3010 of the Act (42 U.S.C. 6930) when in fact Respondent did timely file such a notification and Complainant having moved for withdrawal of the complaint pursuant to 40 CFR 22.14(e) (withdrawal without prejudice), the complaint is dismissed with prejudice.

Dated this 4th day of January 1983.


Spencer T. Nissen
Administrative Law Judge

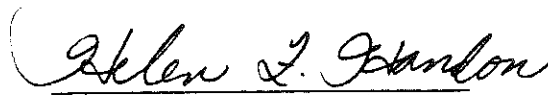
CERTIFICATE OF SERVICE

This is to certify that the original of this Order Dismissing Complaint, dated January 4, 1983, was mailed to the Regional Hearing Clerk, Reg. V, and a copy was mailed to each party in the proceeding as follows:

Eddie E. Scott, Esq.
Cooper Industries, Inc.
First City Tower, Suite 4000
Post Office Box 4446
Houston, Texas 77210

Mary A. Gade, Esq.
Office of Enforcement Counsel
Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

January 4, 1983


Helen F. Handon
Secretary

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF:

Crouse-Hinds Company
7420 N. LeHigh Avenue
Niles, Illinois 60648

}
}
}
}
}
DOCKET NO. V-W-82-R-030

AFFIDAVIT

County of Cook }
 } SS
State of Illinois }

I, Sally K. Swanson, being first duly sworn do hereby affirm and say as follows:

1. Since January 1982, I have been employed as an Environmental Protection Specialist in the Waste Management Division of the United States Environmental Protection Agency (U.S. EPA) Region V.
2. In that capacity, I was assigned to review a proposed Complaint to Crouse Hinds Company. The proposed Complaint cited Crouse-Hinds for failure to file with U.S. EPA a Notification of Hazardous Waste Activity in a timely fashion pursuant to Section 3010(a) of the Resource Conservation and Recovery Act.
3. At the time of my review of the proposed Complaint, I could find no evidence in the files kept by the Waste Management Division that a Notification had ever been filed with U.S. EPA; therefore, I recommended issuance of the proposed Complaint.
4. The Complaint against Crouse-Hinds was filed on September 29, 1982.

5. On November 22, 1982, Ms. Mary A. Gade, attorney for Complainant, and I met with Mr. Eddie E. Scott, attorney for Crouse Hinds, and Mr. Richard Walker, Manager, Crouse-Hinds Facilities Division, at U.S. EPA's office at 111 West Jackson, Chicago, Illinois.
6. During that meeting, Crouse-Hinds presented a copy of its Notification and a certified mail return receipt dated August 19, 1980.
7. After this meeting, a contractor's employee checked further into the files and found a copy of Crouse Hinds' Notification, dated August 14, 1980, which the Waste Management Division considers timely filed. The contractor's employee also found an amended Notification dated October 31, 1980. Those documents were given to me.
8. I reported the above described events to my supervisors, and on December 14, 1982, we requested Mary A. Gade to do the necessary paperwork to withdraw the Complaint.
- Further affiant sayeth naught:

Dated: 30 December, 1982

Sally K. Swanson
Sally K. Swanson

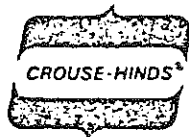
Subscribed and sworn before me this 30 day of December, 1982.

Eileen R. Bloom
Notary Public

My commission expires 11/24/83.

EXHIBIT D

CROUSE-HINDS COMPANY



Lighting Products Division
7420 Lehigh Avenue
Chicago, Illinois 60648
312/774-1200

October 31, 1980

EPA Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Dear Sir:-

When we sent the EPA Form 8700-12, "NOTIFICATION OF Hazardous Waste Activity" prior to August 18, 1980, under Section VI "Type of Hazardous Waste Activity", we placed an "x" in the box for "Generation" only.

We have since determined that it will be necessary to store our hazardous waste for more than ninety (90) days.

A revised form is attached, changing Section VI to include Box "A" Generation and Box "C" Treat/Store/Dispose.

Note, Also that on our original report we failed to put an M in the box for type of ownership.

We are presently preparing Part A forms 1 and 3 for submittal to obtain a permit for generation and storage.

Sincerely,

J.R. Thomas
Plant Manager

Crouse-Hinds Co.
Lighting Products Division
7420 N. Lehigh Avenue
Niles, IL 60648


 U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all Items. "Instructions" appear on a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3070 of the Resource Conservation and Recovery Act).

PLEASE PLACE LABEL IN THIS SPACE

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(City, State, & Date)

I. NAME OF INSTALLATION

COR O, US E - H H H D S C O L I G H T I N G P R O D U C T S D I V

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 7 4 2 0 L E H I G H A V E N U E

CITY OR TOWN

ST.

ZIP CODE

4 H I L E S

IL 60648

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 7 4 2 0 L E H I G H A V E N U E

CITY OR TOWN

ST.

ZIP CODE

6 H I L E S

IL 60648

IV. INSTALLATION CONTACT

NAME AND TITLE (Last, First, & Job Title)

PHONE NO. (Area Code & No.)

2 J R T H O M A S P L A N T M A N A G E R

312-774-1200

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 C R O U S E H H H D S C O M P A N Y

VI. TYPE OF OWNERSHIP
(Enter the appropriate letter in the box)

VII. TYPE OF HAZARDOUS WASTE ACTIVITY (Enter "X" in the appropriate box(es))

F = FEDERAL
NF = NON-FEDERAL

H

☒ A. GENERATION☐ B. TRANSPORTATION (Complete Item VII)☒ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VIII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

IX. FIRST OR SUBSEQUENT NOTIFICATION

Check "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

☐ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (Complete Item C)

C. INSTALLATION'S EPA I.D. NO.

I L O O 9 3 0 5 8 3

X. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

ID. - FOR OFFICIAL USE ONLY									
U									
W									

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.21 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F 0 G 1	F 0 1 7				
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.22 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.23 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.24 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous waste your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(20001)

☐ 2. CORROSIVE
(20002)

☐ 3. REACTIVE
(20003)

☐ 4. TOXIC
(20004)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

John R. Thomas

NAME & OFFICIAL TITLE (Type or Print)

JOHN R. THOMAS PLANT MGR.

DATE SIGNED

10-31-80

EXHIBIT E

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V

IN THE MATTER OF

Crouse-Hinds Company
7420 N. Lehigh Avenue
Niles, Illinois 60648

EPA ID. NO. ILD049301583

DOCKET NO. V-W-82-R-

October 26, 1982

ANSWER

This answer is filed on behalf of Respondent, Crouse-Hinds Company.

1. Respondent admits it owns and operates a facility located at 7420 North Lehigh Avenue, Niles, Illinois and that it is a New York corporation whose Registered Agent in Illinois is C. T. Corporation System, 208 South LaSalle Street, Chicago, Illinois 60604.

2. Respondent admits Section 3005 of Subtitle C of the Act provides in part, that:

"the Administrator (of the Environmental Protection Agency) shall promulgate regulations requiring each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste identified or listed under this subtitle to have a permit issued pursuant to this Section. (After the effective date of the regulations) the treatment, storage, or disposal of any such hazardous waste is prohibited except in accordance with such a permit." Material in parenthesis added.

3. Respondent admits that regulations requiring each person owning or operating a facility for the treatment, storage, or disposal of hazardous waste to have a permit issued pursuant to Section 3005 were promulgated by the Administrator on May 19, 1980, are codified at 40 CFR Parts 122 and 124, and the effective date of these regulations is November 19, 1980.

4. Respondent admits Section 3005(e) of the Act provides that an owner or operator of a facility shall be treated as having been issued a permit pending final administrative disposition of his/her permit application provided that: (1) the facility was in existence on November 19, 1980; (2) the requirements of Section 3010(a) of the Act concerning notification of hazardous waste activity have been complied with, and (3) application for a permit has been made. This statutory authority

to operate is known as interim status. USEPA regulations implementing these provisions are found at 40 CFR Part 122.

5. Respondent denies that on or after November 19, 1980, Crouse-Hinds Company has stored substances, including spent halogenated solvents, which have been identified or listed as hazardous waste under Section 3001 of the Act, 40 CFR Part 261, without a permit and without having achieved Interim status, in violation of Section 3005(a) of the Act and/or that Interim status was not achieved because Crouse-Hinds Company failed to submit a notification of hazardous waste activity by August 18, 1980, as required by Section 3010(a) of the Act and/or that Respondent has not filed such a notification to date. Respondent admits a Part A permit application pursuant to 40 CFR 122.22 was filed on November 14, 1980.

Respondent did file a notification of hazardous waste activity by August 18, 1980.

6. Respondent neither denies or admits the determinations stated in paragraph 6 of the Complaint.

Respondent is interested in resolving this matter through an informal settlement conference and is pursuing informal settlement through conference with USEPA. Respondent is requesting a Hearing by a separate writing.

Respectfully submitted,

CROUSE-HINDS COMPANY, Respondent

By Eddie E. Scott

Eddie E. Scott
Attorney for Respondent
Cooper Industries, Inc.
P.O. Box 4446

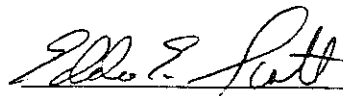
CERTIFICATE OF SERVICE

I hereby certify that I have caused copies of the foregoing Answer to be served upon the persons designated below on the date below, by causing said copies to be deposited in the U.S. Mail, First Class (certified return receipt requested, postage prepaid) at Houston, Texas, in envelopes addressed to:

(1) United States Environmental Protection Agency, Region V
Office of Enforcement Counsel, Regional Counsel's Office
Attention: Ms. Mary A. Gade
230 South Dearborn Street
Chicago, Illinois 60604

(2) Regional Hearing Clerk
USEPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dated this 26 day of October, 1982.



Eddie E. Scott
Attorney for Respondent

EXHIBIT F

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:

Crouse-Hinds Company
7420 N. Lehigh Avenue
Niles, Illinois 60648

EPA ID NO. ILD049301583

DOCKET NO. V-W-82-R-030

ORDER TO WITHDRAW COMPLAINT

Having duly considered Complainant's Motion to Withdraw Complaint and finding it meritorious, pursuant to 40 C.F.R. §22.14(e), I hereby ORDER:

Complaint Number V-W-82-R-030, filed pursuant to Section 3008 of the Resource Conservation and Recovery Act (RCRA), against Grouse Hinds Company on September 29, 1982, is hereby withdrawn on the basis that Respondent filed a Notification of Hazardous Waste Activity in a timely manner in conformance with Section 3010(a) of RCRA.

Spencer T. Nissen
Administrative Law Judge

Dated: Decmeber ___, 1982

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Motion to Withdraw Complaint and proposed Order to Withdraw Complaint to be served upon, Eddie E. Scott, Attorney, Crouse Hinds Company, Cooper Industries, Inc., P.O. Box 4446, Houston, Texas, by placing it in a Government franked envelope, first class, certified return receipt requested, and depositing it in the U.S. Mail Chute located at 230 S. Dearborn Street, Chicago, Illinois on the date below.

I have further caused the original and one copy of the foregoing Motion to Withdraw Complaint and proposed Order to Withdraw Complaint and this Certificate of Service to be personally served in the Office of Regional Counsel, U.S. EPA, Region V, at 230 South Dearborn Street, Chicago, Illinois 60604 on the date below.

These are said persons' last addresses known to the subscriber.

Dated this 30 day of Decmeber, 1982.

Mary A. Gade
Mary A. Gade
Assistant Regional Counsel

03120103
STATE IDENTIFICATION NUMBER
(If Applicable)

TLD049301583
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: Crouse - Hinds Company
(B) Street: 7420 N. Lehigh Ave
(C) City: NILES (D) State: IL (E) Zip Code: 60648
(F) Phone: (312) 774-1200 (G) County: Cook
(H) Operator: Sawz
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code: _____
(M) Phone: _____ (N) County: _____
(O) Owner: Crouse - Hinds Company
(P) Street: 7546 Morgan Rd. P.O. Box 4999
(Q) City: Syracuse (R) State: NY (S) Zip Code: 13221
(T) Phone: (315) 477-8171 (U) County: _____
(V) Date of Inspection: 2-5-82 (W) Time of Inspection (From) 9:30A (To) 1130A
(X) Weather Conditions: 15° Snow

(Y)	Person(s) Interviewed	Title	Telephone
	<u>John Thomas</u>	<u>Plant Mgr.</u>	<u>(312) 774-1200</u>
	<u>Richard Walker</u>	<u>Mgr Facilities Engineering</u>	<u>(312) 477-8171</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>Glenn Steward</u>	<u>EPA/EPs</u>	<u>(312) 345-9780</u>
(AA)	Preparer Information		
	Name <u>Glenn J. Steward</u>	Agency/Title <u>EPA/EPs</u>	Telephone <u>(312) 345-9780</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- ☒ A. Storage and/or Treatment
- ☒ 1. Containers (I)
 - 2. Tanks (J)
 - 3. Surface Impoundments (K)
 - 4. Waste Piles (L)
- ☐ B. Land Treatment (M)
- ☐ C. Landfills (N)

- ☐ D. Incineration and/or Thermal Treatment (O and P)
- ☐ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	a/a	—	_____
2. Facility expansion?	—	N/A	—	_____
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	_____
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	✓	—	—	_____
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	✓	—	—	_____
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	ADT Security System
2. Artificial or natural barrier around facility?	✓	—	—	Fenced YARD AREA
3. Controlled entry?	✓	—	—	_____
4. Danger sign(s) at entrance?	✓	—	—	_____
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	—	✓	—	No inspection
2. Records of operator error?	—	✓	—	log maintained
3. Records of discharges?	—	✓	—	_____

*Not Inspected

1. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Description of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(F) If required, are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. No smoking signs?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Separation and protection from ignition sources?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation
of Facility:

Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

Yes No NI* Remarks

_____ ✓ _____

(B) If required, does the facility
have the following equipment:

1. Internal communications or
alarm systems?

✓ _____

2. Telephone or 2-way radios
at the scene of operations?

✓ _____

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

✓ _____

Indicate the volume of water and/or foam available for fire control:

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the owner or operator
established testing and
maintenance procedures
for emergency equipment?

✓ _____

*ADT ACCOMPANIES plant.
REPS for testing /monthly*

2. Is emergency equipment
maintained in operable
conditions?

✓ _____

(D) Has owner or operator provided
immediate access to internal
alarms? (if needed)

✓ _____

*Not Inspected

(E) Is there adequate aisle space
for unobstructed movement?

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the
following information:

Yes No NI*

Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

✓

 ✓ No phone # or home address.

 ✓ No listing included.

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	—	✓	—	_____
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	✓	—	—	_____
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	✓	—	—	_____
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	✓	—	—	_____
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	N/A	—	—	_____

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	N/A	—	—	_____
2. Are records of past shipments retained for 3 years?	N/A	—	—	_____
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	N/A	—	—	_____

*Not Inspected

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓ _____

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓ _____

c. The location and quantity of each hazardous waste within the facility?

✓ storage facility only

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

N/A _____

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓ _____

f. Reports detailing all incidents that required implementation of the Contingency Plan?

N/A to date.

g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓ _____

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>Not contemplated.</u>
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				<u>N/A</u>

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

**I
USE AND MANAGEMENT OF CONTAINERS**

Facility Name: Glenn Starnard Date of Inspection: 02-05-82

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Are containers compatible with waste in them?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Are containers stored closed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Are containers managed to prevent leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and defects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>ignitable waste.</u>

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>N/A</u>	---	---	-----
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	<u>N/A</u>	---	---	-----

J
TANKS

Facility Name: N/A Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	-----
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	-----
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	-----
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	-----
5. Are required daily and weekly inspections done?	---	---	---	-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	_____	_____	_____	_____
4. Are inspection procedures followed according to 265.403?	_____	_____	_____	_____
5. Are the special requirements fulfilled for ignitable or reactive wastes?	_____	_____	_____	_____
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	_____	_____	_____	_____

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?				<u>NO MATERIAL SHIPPED TO DATE</u>
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	_____	_____	_____	_____
2. Name, mailing address, telephone number, and EPA ID Number of Generator	_____	_____	_____	_____

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>N/A</u>			
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>N/A</u>			
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>N/A</u>			
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>N/A</u>			
7. Required certification?	<u>N/A</u>			
8. Required signatures?	<u>N/A</u>			
(C) Does the owner or operator submit exception reports when needed?	<u>N/A</u>			

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>✓</u>			
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>N/A</u>			<u>NO LABELS / NO DATES</u> <u>None shipped to date</u>
(C) If required, are placards available to transporters of hazardous waste?	<u>✓</u>			

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Crouse-Hinds manufactures street lighting fixtures AND support poles. Steel poles ARE fabricated from bar stock, ALUMINUM poles ARE purchased. Some forming of ALUMINUM is done on site for use in light fixtures. Finished housings & poles ARE PAINTED on site. From the paint spraying operations a WASTE paint sludge is generated for disposal.

This facility notified as a generator/storage facility under RCRA. The waste was classified as F017, PAINT waste which was subsequently delisted. However a recent ANALYSIS indicates that STORED PAINT sludge generated in the past 2 yrs contains LEAD in EXCESS of the ALLOWABLE AMOUNTS. The waste is therefore considered D008 S.P. Toxic and D001 Incombustible. The facility ∴ chooses to retain the storage facility status.

The following deficiencies in compliance were noted.

- ① no operator inspections were conducted w/ logs as required.
- ② the contingency plan lacked
 - A home phone & Address of emergency coordinator
 - B A listing of AVAILABLE emergency equipment.
- ③ contingency plan was not on file with the local emergency response teams.
- ④ the operating record did not contain
 - A date of each waste's storage
 - B location & quantity of stored waste.

03120103

(20) — — — — (25)

(26)

Inspector 6 ✓ 5
(27) (29)

(31)

LPC 4 1/79 5,000

I S or D 5
(62)

(62)

GENERAL REMARKS: This facility manufactures street lighting fixtures and posts. Steel posts are manufactured from heavy gauge aluminum plate, are painted for weather. The light fixtures are assembled on site from components which are produced elsewhere. Some forming of aluminum parts is done in-house. Some of the material is fabricated as decorative / space medicine wall. The hazardous waste produced is paint sludge, from paint spray booths, which contains Pb & Cr. The material is considered hazardous because of the concentration of Cr Toxicity D001. The material has been shipped since the filing of the law. The quantity produced is small. The site probably has less than 1000 lbs of the. The company would like a larger storage facility as it is not cost effective to ship in small quantities on a 1 or 2 ton basis.

DIAGRAM: The following deficiencies were noted

- ① No separate inspection of materials & finished
- ② Could say the lack of ① shows poor address of the issue
- ③ List of necessary equipment
- ④ Induction plan not on file with local emergency services
- ⑤ No fire alarm
- ⑥ No fire extinguishers
- ⑦ No fire escape
- ⑧ No fire escape
- ⑨ No fire escape
- ⑩ No fire escape
- ⑪ No fire escape
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED MAY 17 1993
WMD RCRA
RECORD CENTER *Compliance*

REPLY TO THE ATTENTION OF:

HRE-8J

May 12, 1993

Mr. Chris Prucnal
Facility Manager
Warehouse Club, Inc.
Former Crouse-Hinds Company
7420 Lehigh Avenue
Niles, Illinois 60648

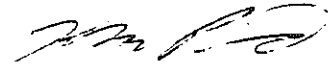
Re: Visual Site Inspection
Former Crouse-Hinds Company
Lighting Products Division
Niles, Illinois
ILD 049 301 583

Dear Mr. Prucnal:

The U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

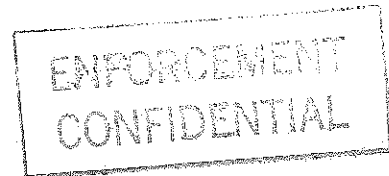
Sincerely yours,


Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

N/C

CORRECTIVE ACTION STABILIZATION QUESTIONNAIRE

Completed by: Jack Brunner
Date: September 23, 1992



Background Facility Information

Facility Name: Crouse-Hinds Company
EPA Identification No.: ILD 049 301 583
Location (City, State): Niles, Illinois
Facility Priority Rank: Low

RECEIVED
OCT 14 1992

1. Is this checklist being completed for one solid waste management unit (SWMU), several SWMUs, or the entire facility? Explain.

The entire facility, which consist of five SWMUs.

Status of Corrective Action Activities at the Facility

2. What is the current status of HSWA corrective action activities at the facility?

- ☐ No corrective action activities initiated (Go to 5)
☒ RCRA Facility Assessment (RFA) or equivalent completed
☐ RCRA Facility Investigation (RFI) underway
☐ RFI completed
☐ Corrective Measures Study (CMS) completed
☐ Corrective Measures Implementation (CMI) begun or completed
☐ Interim Measures begun or completed

3. If corrective action activities have been initiated, are they being carried out under a permit or an enforcement order?

- ☐ Operating permit
☐ Post-closure permit
☐ Enforcement order
☒ Other (Explain)

The facility has completed RCRA closure activities. No corrective actions have been initiated in the past.

4. Have interim measures, if required or completed [see Question 2], been successful in preventing the further spread of contamination at the facility?

- ☐ Yes
☐ No
☐ Uncertain; still underway
☒ Not required

Additional explanatory notes:

No interim measures have been required.

Crouse-Hinds Company - ILD 049 301 583

RELEASED
DATE 11/31/01
RIN # 44
INITIALS [Signature]

Facility Releases and Exposure Concerns

5. To what media have contaminant releases from the facility occurred or been suspected of occurring?

- ☐ Ground water
- ☐ Surface water
- ☐ Air
- ☐ Soils
- ☒ None

6. Are contaminant releases migrating off-site?

- ☐ Yes; Indicate media, contaminant concentrations, and level of certainty.

Groundwater:

Surface water:

Air:

Soils:

- ☐ No
- ☐ Uncertain

- 7a. Are humans currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 8a)
- ☐ No
- ☐ Uncertain

Additional explanatory notes:

There is no history of and a low potential for releases to environmental media at this facility.

- 7b. Is there a potential for human exposure to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
- ☒ No
- ☐ Uncertain

Additional explanatory notes:

There is no history of and a low potential for releases to environmental media at this facility.

- 8a. Are environmental receptors currently being exposed to contaminants released from the facility?

- ☐ Yes (Go to 9)
- ☒ No
- ☐ Uncertain

Additional explanatory notes:

There is no history of and a low potential for releases to environmental media at this facility.

- 8b. Is there a potential that environmental receptors could be exposed to the contaminants released from the facility over the next 5 to 10 years?

- ☐ Yes
- ☒ No
- ☐ Uncertain

Additional explanatory notes:

There is no history of and a low potential for releases to environmental media at this facility.

Anticipated Final Corrective Measures

9. If already identified or planned, would final corrective measures be able to be implemented in time to adequately address any existing or short-term threat to human health and the environment?

☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

There is no history of and a low potential for releases to environmental media at this facility.

10. Could a stabilization initiative at this facility reduce the present or near-term (e.g., less than two years) risks to human health and the environment?

☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

There is no history of and a low potential for releases to environmental media at this facility.

11. If a stabilization activity were not begun, would the threat to human health and the environment significantly increase before final corrective measures could be implemented?

☐ Yes
☒ No
☐ Uncertain

Additional explanatory notes:

There is no history of and a low potential for releases to environmental media at this facility.

Technical Ability to Implement Stabilization Activities

12. In what phase does the contaminant exist under ambient site conditions? Check all that apply.

☐ Solid
☐ Light non-aqueous phase liquids (LNAPLs)
☐ Dense non-aqueous phase liquids (DNAPLs)
☐ Dissolved in ground water or surface water
☐ Gaseous
☒ Other No contamination exists.

13. Which of the following major chemical groupings are of concern at the facility?

☐ Volatile organic compounds (VOCs) and/or semi-volatiles
☐ Polynuclear aromatics (PAHs)
☐ Pesticides
☐ Polychlorinated biphenyls (PCBs) and/or dioxins
☐ Other organics
☐ Inorganics and metals
☐ Explosives
☒ Other Waste oil/petroleum hydrocarbons

14. Are appropriate stabilization technologies available to prevent the further spread of contamination, based on contaminant characteristics and the facility's environmental setting? [See Attachment A for a listing of potential stabilization technologies.]

☐ Yes; Indicate possible course of action.

☒ No; Indicate why stabilization technologies are not appropriate; then go to Question 18.

There is no history of and a low potential for releases to environmental media at this facility.

15. Has the RFI, or another environmental investigation, provided the site characterization and waste release data needed to design and implement a stabilization activity?

☐ Yes
☐ No

If No, can these data be obtained faster than the data needed to implement the final corrective measures?

☐ Yes
☐ No

Timing and Other Procedural Issues Associated with Stabilization

16. Can stabilization activities be implemented more quickly than the final corrective measures?

☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

17. Can stabilization activities be incorporated into the final corrective measures at some point in the future?

☐ Yes
☐ No
☐ Uncertain

Additional explanatory notes:

Conclusion

18. Is this facility an appropriate candidate for stabilization activities?

- () Yes
() No, not feasible
(X) No, not required
() Further investigation necessary

Explain final decision, using additional sheets if necessary.

There is no history of and a low potential for releases to environmental media at this facility.

[illegible]



**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**FORMER CROUSE-HINDS COMPANY
LIGHTING PRODUCTS DIVISION FACILITY
NILES, ILLINOIS**

**ILD 049 301 583
FINAL REPORT**

Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

Work Assignment No.	:	C05087
EPA Region	:	5
Site No.	:	ILD 049 301 583
Date Prepared	:	March 10, 1993
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087-IL4W
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
Prepared By	:	Dynamac Corporation (Deborah Hall)
Telephone No.	:	(312) 466-0222
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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Attachment

- A EPA PRELIMINARY ASSESSMENT FORM 2070-12
- B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
- C VISUAL SITE INSPECTION FIELD NOTES

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ENFORCEMENT
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EXECUTIVE SUMMARY

Dynamac Corporation (Dynamac) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the former Crouse-Hinds Corporation - Lighting Products Division (CHC - LPD) facility in Niles, Cook County, Illinois. This summary highlights the results of the PA/VSI and the potential releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in attachment A to assist in prioritizing RCRA facilities for corrective action.

The former CHC - LPD facility is currently owned by Warehouse Club Inc. (WCI), and serves as a wholesale "cash and carry" shopping area and a commercial oil/tire service center. WCI generates and manages nonhazardous waste motor oil, used tires, and used cardboard. WCI has operated at this location since 1983. The facility occupies approximately 10 acres in a predominantly industrial area and employs about 150 people. The facility is not currently regulated under RCRA.

According to Steven Liedtke, an engineer employed by CHC at the facility during the late 1970s until approximately 1982, the Revere Lighting Company began manufacturing street lighting fixtures and support poles at this location in the early 1960s. Operations included machining, fabricating, welding, assembling, painting, and degreasing steel and aluminum parts to form the finished product. Sometime in the 1970s, CHC purchased the Revere Lighting Company and the facility. According to CHC's August 1980 Notification of Hazardous Waste Activity, the former CHC - LPD facility generated spent solvent (F001) and paint waste (F017). The Illinois Environmental Protection Agency (IEPA) noted in a February 1982 IEPA inspection report that a more recent analysis of the paint waste indicated it should be characterized as D001 and D008 due to its ignitable characteristic and lead content. According to Mr. Liedtke, the facility also generated nonhazardous scrap steel and aluminum. There was no further information available in EPA or IEPA files regarding hazardous or nonhazardous waste generation and management at the facility.

CHC submitted a Part A permit application for the facility in November 1980. In September 1982, CHC submitted certification of closure activities for the Former Container Storage Area (SWMU 4) at the facility to the IEPA. IEPA acknowledged receipt of closure certification and approved the closure on November 7, 1983. Other SWMUs at the facility were not required to undergo RCRA closure because the facility did not store hazardous wastes in those units for greater than 90 days. Following closure activities, CHC sold the facility to WCI, and moved out of state.

RELEASED
DATE 1/3/01
RIN # 101
INITIALS JW

The PA/VSI identified the following five SWMUs:

1. Waste Motor Oil Aboveground Storage Tanks (AST)
2. Used Tire Storage Area
3. Used Cardboard Storage Area
4. Former Container Storage Area
5. Former Scrap Metal Hoppers

The PA/VSI did not identify any AOCs.

The potential for a release to ground water, surface water, air, and on-site soils from current facility SWMUs is low. SWMU 1 manages nonhazardous waste in closed 300-gallon steel ASTs on a concrete floor. SWMUs 2 and 3 manage nonhazardous solid waste on an asphalt surface.

The potential for a release to ground water, surface water, air, and on-site soil from past facility SWMUs is also low. SWMU 4 managed hazardous waste in closed containers on an asphalt surface. The unit has been inactive since it underwent IEPA-approved RCRA closure in 1983. SWMU 5 managed nonhazardous solid waste in steel hoppers on an asphalt surface and has also been inactive since 1983. There was no documentation of a release to environmental media from SWMUs in EPA or IEPA files at the time of the PA/VSI.

The nearest surface water body, the North Branch of the Chicago River, is located about one mile west of the facility. This river is used for industrial purposes including transportation, and non-contact water intake and discharge, and for recreational boating. There is no direct path to any surface water body from the facility.

Ground water in the area of the facility is not used as an industrial supply or drinking water source. According to Scott Jochim, Niles Department of Public Works, there are no active ground water wells in the Village of Niles. A release to ground water would not be likely to impact any human or environmental receptors.

There are no mapped wetlands or other sensitive environments within two miles of the facility.

Dynamac recommends no further action be taken for the facility at this time. Dynamac notes information regarding land use at the facility prior to the 1960s was not available at the time of the PA/VSI. For this reason, EPA may want to consider conducting historical research to determine whether operations prior to the 1960s present a potential for environmental impact at this location.

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in EPA Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the former Crouse-Hinds Company - Lighting Products Division (CHC - LPD) facility in Niles, Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of the PA/VSI of the former CHC - LPD facility (EPA Identification No. ILD 049 301 583) in Niles, Cook County, Illinois. The PA was completed on March 25, 1992. Dynamac gathered and reviewed information from files at the Illinois Environmental Protection Agency's (IEPA) Springfield, Illinois office and from EPA Region 5 RCRA files. In addition, Dynamac gathered and reviewed information from the Federal Emergency Management Agency (FEMA), the U.S. Geological Survey (USGS), the U.S. Department of the Interior (USDI), and from the National Oceanic and Atmospheric Administration (NOAA).

Prior to the VSI, Dynamac contacted a representative from CHC who provided the name and telephone number of Mr. Steven Liedtke, a current CHC employee who was previously employed at the former CHC - LPD facility and was familiar with past operations at the facility. Dynamac conducted a telephone interview with Mr. Liedtke, an engineer at the former CHC - LPD facility, on June 3, 1992 (CHC, 1992).

Deborah Hall and Russ Crittenden of Dynamac conducted the VSI on June 22, 1992. The VSI included interviews with facility representatives of the Warehouse Club, Inc. (WCI), the current owner and operator of the facility, and a walk-through inspection of the facility. Dynamac identified five SWMUs and no AOCs at the facility.

Dynamac completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and five inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; a history of documented releases; regulatory history; environmental setting; and receptors.

2.1 FACILITY LOCATION

The former CHC - LPD facility is located at 7420 Lehigh Avenue in Niles, Cook County, Illinois. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 42° 00' 59" N and longitude 87° 46' 35" W) (CHC, 1980c). The facility occupies approximately 10 acres in a predominantly industrial area.

The facility is bordered on the northwest by Fort Dearborn Lithographers, on the northeast by Johnson and Quin, Inc., on the east by Lehigh Avenue, on the southeast by a Temple Steel warehouse, on the southwest by a residential area, and on the west by a Budweiser product distribution center.

2.2 FACILITY OPERATIONS

The former CHC - LPD facility is currently owned by WCI, and serves as a wholesale "cash and carry" shopping area and a commercial oil/tire service center. Both the shopping area and the oil/tire service center are available to members only. WCI stores clean oil for use in the oil/tire service center in 55-gallon drums outside on a concrete pad.

Prior to 1983, the former CHC - LPD facility manufactured street lighting fixtures and support poles. Operations at the facility included machining, fabricating, welding, assembling, painting, and degreasing steel and aluminum parts to form the finished product. There was no information available in EPA or IEPA files regarding where the facility stored its products or the raw materials used during its manufacturing processes.

Solid wastes generated from facility operations at the former CHC - LPD facility and the SWMUs where they were managed are discussed in detail in Section 2.3.

WCI has operated at this location since 1983 and currently employs approximately 150 persons. The facility consists of a fenced, ten-acre parcel of land containing one building and a large asphalt parking lot. The building occupies approximately 110,235 square feet. The oil/tire service center occupies approximately 4,925-square-feet in the southwest corner of the building, and the shopping area occupies the remainder of the building.



According to Steven Liedtke, an engineer employed at the former CHC - LPD facility from the late 1970s until 1982, the Revere Lighting Company began operations at this location in the early 1960s. Sometime in the 1970s, CHC purchased the Revere Lighting Company and the facility. CHC continued operations at the facility until 1983, when CHC sold the facility to WCI (CHC, 1992).

2.3 WASTE GENERATION AND MANAGEMENT

WCI does not generate any hazardous waste at this facility. The current waste streams at the facility are nonhazardous waste motor oil, used tires, and used cardboard. Information regarding past waste generation and management at the facility was limited. According to CHC's August 1980 Notification of Hazardous Waste Activity (Notification) for the facility, the facility generated spent solvent (F001) and paint waste (F017) (CHC, 1980a). IEPA noted in a February 1982 IEPA inspection report that a more recent analysis of the paint waste indicated it should be characterized as D001 and D008 due to its ignitable characteristic and lead content (IEPA, 1982). A facility diagram included in the facility's 1980 Part A permit application (Part A) indicated the hazardous waste storage area was located outdoors in the far southwest corner of the facility (CHC, 1980c). Mr. Liedtke stated that in addition to the hazardous wastes indicated on the Notification, the facility generated nonhazardous scrap steel and aluminum during manufacturing operations (CHC, 1992). There was no further information available in EPA or IEPA files regarding hazardous or nonhazardous waste generation and management at the facility.

WCI generates approximately 450 gallons per week of nonhazardous waste motor oil from operations at the oil/tire service center. The facility manages waste oil from oil change operations in one of two 300-gallon steel Waste Motor Oil Aboveground Storage Tanks (AST) (SWMU 1). Safety-Kleen Corporation transports this waste off site to its facility in Elgin, Illinois for recycling.

WCI generates used tires from tire change operations at the oil/tire service center. The facility stores the used tires in the Used Tire Storage Area (SWMU 2). Southwest Tire Company transports this waste off site to its facility in Chicago, Illinois. Chris Prucnal, General Manager, WCI, stated the generation rate of the used tires varies greatly. Mr. Prucnal could not recall the final disposition of the used tires.

WCI generates used cardboard from warehouse operations and stores this waste in the Used Cardboard Storage Area (SWMU 3). Mr. Prucnal could not estimate the generation rate for this waste. C and M Salvage transports this waste off site to its facility in Northbrook, Illinois for recycling.

According to the facility's November 1980 Part A, the former CHC - LPD facility annually generated 700 pounds of spent solvent (F001) and 28,800 pounds of paint waste (D001, D008) (CHC, 1980c). The facility stored these wastes in the Former Container Storage Area (SWMU 4) for at least two years; the 1982 IEPA inspection report indicated no waste from the unit had been shipped off site for disposal since at least November 1980, when CHC filed the Part A. At the time of the 1982 IEPA inspection, there were

approximately twenty-five 55-gallon drums containing spent solvents and paint waste in this unit (IEPA, 1982). Mr. Liedtke could not recall the transporter, disposal facility, or final disposition of these wastes (CHC, 1992). There was no further information concerning these wastes in EPA or IEPA files at the time of the VSI.

According to Mr. Liedtke, the former CHC - LPD facility generated nonhazardous scrap steel and aluminum during machining and fabricating operations. Mr. Liedtke stated the facility managed scrap steel and aluminum in one of several Former Scrap Metal Hoppers (SWMU 5) located outdoors. Mr. Liedtke could not recall with any certainty whether the Former Scrap Metal Hoppers had been located along the south or west side of the facility or whether the facility had managed the waste indoors prior to moving the waste outdoors to the Former Scrap Metal Hoppers. In addition, Mr. Liedtke could not recall the generation rate, transporter, disposal facility, or final disposition of this waste (CHC, 1992). There was no information concerning this waste in EPA or IEPA files at the time of the VSI.

During the telephone interview with Mr. Liedtke, Dynamac inquired as to whether the former CHC - LPD facility had generated any additional wastes, hazardous or nonhazardous. Mr. Liedtke was not aware of any additional hazardous or nonhazardous wastes generated at the facility prior to 1983 (CHC, 1992). No other information concerning past waste generation and management processes at the facility, how past wastes were managed, or the final disposition of past wastes was available in EPA or IEPA files at the time of the PA/VSI.

The facility SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

2.4 HISTORY OF DOCUMENTED RELEASES

Mr. Liedtke did not recall any releases occurring at the former CHC - LPD facility (CHC, 1992). There was no history of documented releases at the facility reported in available in EPA or IEPA files at the time of the PA/VSI.

2.5 REGULATORY HISTORY

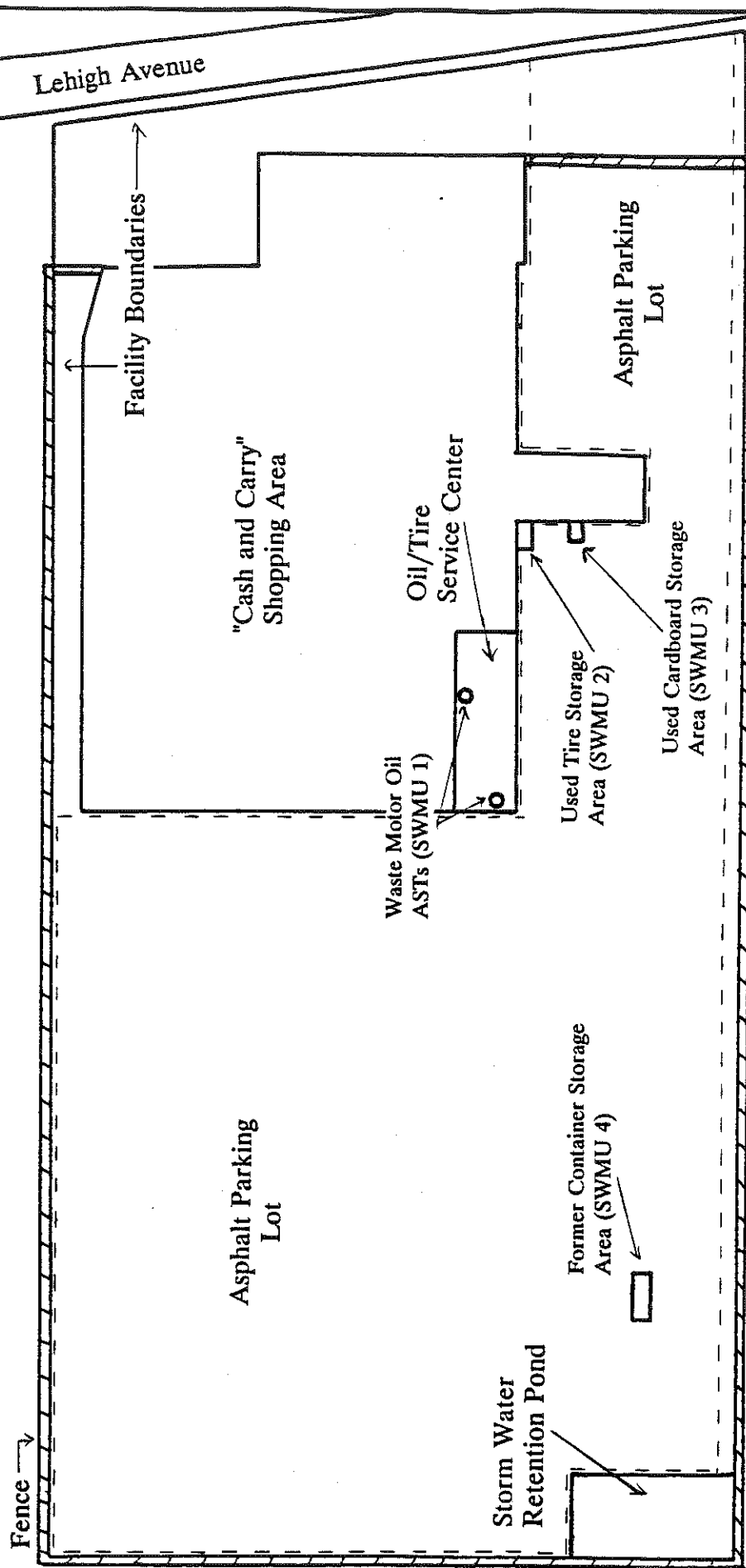
CHC submitted a Notification identifying the former CHC - LPD facility as a generator of hazardous wastes to the EPA on August 14, 1980, and a subsequent Notification identifying the facility as a generator and storage facility to the EPA on October 31, 1980 (CHC, 1980a and 1980b). CHC also submitted a Part A identifying the facility as a storage facility to the EPA on November 14, 1980. The Part A indicated the facility stored a total of 700 gallons of F001 waste and 28,800 gallons of F017 waste annually (CHC, 1980c). Analysis of the paint waste in 1982 indicated the waste should be listed as D001

TABLE 1
SOLID WASTE MANAGEMENT UNITS

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Waste Motor Oil ASTs	No	Active
2	Used Tire Storage Area	No	Active
3	Used Cardboard Storage Area	No	Active
4	Former Container Storage Area	Yes	Inactive; RCRA closed in 1983
5	Former Scrap Metal Hoppers	No	Inactive

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

Note: Exact location of SWMU 5 (Former Scrap Metal Hoppers) was not available in EPA or IEPA files at the time of the PA/VSL. According to a CHC employee, SWMU 5 was located along either the south or west side of the building.



Scale 1 : 1,200



1 Inch = 100 Feet



NORTH

Former CHC - LPD Facility
Niles, Illinois

Figure 2
Facility Layout

TABLE 2
SOLID WASTES

Waste/EPA Waste Code^a	Source	Solid Waste Management Unit
Waste Motor Oil/NA ^a	Oil Change Operations - WCI	1
Used Tires/NA ^a	Tire Change Operations - WCI	2
Used Cardboard/NA ^a	Warehouse Operations - WCI	3
Spent Solvent/F001	Degreasing Activities - CHC - LPD	4
Paint Waste/D001, D008 ^b	Painting Activities - CHC - LPD	4
Scrap Steel and Aluminum/NA ^a	Machining and Fabricating Operations - CHC - LPD	5

^a NA (not applicable) designates nonhazardous waste.

^b Prior to 1982, this waste was listed as F017.

and D008 for its ignitable characteristic and lead content (IEPA, 1982). The Part A identified a container storage area (S01) with the capacity to store 3,300 gallons of waste. The S01 code referred to the Former Container Storage Area (SWMU 4). A facility diagram included in the Part A indicated the unit was located outdoors in the far southwest corner of the facility (CHC, 1980c).

CHC submitted certification of closure activities for the Former Container Storage Area (SWMU 4) to the IEPA on September 21, 1982 (CHC, undated; Metcalf, 1983). IEPA acknowledged receipt of closure certification and approved the closure on November 7, 1983 (IEPA, 1983). Following closure activities, CHC sold the facility to WCI. The facility has not been regulated under RCRA since WCI purchased it in 1983.

During a RCRA compliance inspection on February 5, 1982, IEPA cited the facility for deficiencies in paperwork including the operator inspection logs, the contingency plan, and the operating record (IEPA, 1982). On June 3, 1982, IEPA received a letter from Richard Walker, Facilities Engineering Manager at the former CHC - LPD facility, which included portions of copies of the deficient documents showing the corrections made by the facility (CHC, 1982). There was no Federal or state file information indicating whether IEPA approved of the corrections.

The former CHC - LPD facility operated under state air permit Nos. 04120023 and 74120023, which addressed two combination gas/oil-burning boilers at the facility (IEPA, 1978 and 1981). There was no EPA or IEPA file information available at the time of the VSI regarding air permit compliance problems at the facility or whether IEPA conducted air permit compliance inspections at the facility. There was no information in EPA or IEPA files indicating whether there had been any complaints regarding the facility from neighboring facilities, or whether any Superfund activity had been conducted at the facility.

The former CHC - LPD facility was not required to have a National Pollutant Discharge Elimination System (NPDES) permit.

2.6 ENVIRONMENTAL SETTING

This section describes the climate; flood plain and surface water; geology and soils; and ground water in the vicinity of the facility.

2.6.1 Climate

The facility is located approximately four miles northeast of O'Hare International Airport, the nearest National Weather Service office. The climate in this area is continental with cold winters and warm summers. Lake Michigan, located about seven miles east of the facility, has a moderating influence on temperature extremes. The average annual daily temperature is 49.2° fahrenheit (F). The highest average daily temperature is 73.0° F in

July, and the lowest average daily temperature is 21.4° F in January. Mean annual precipitation is 33.34 inches (NOAA, 1990). Mean annual lake evaporation is approximately 30 inches and net annual precipitation is approximately 3 inches. The one-year 24-hour maximum rainfall is approximately 2.4 inches (NOAA, 1979). Average wind speed and direction is west-southwest at 10 miles per hour. The wind is strongest in April, blowing at an average of 12 miles per hour from the west-southwest (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The facility is located in an area of minimal flooding outside the 100-year flood plain of any surface water body (FEMA, 1979). The nearest surface water body is the North Branch of the Chicago River, located about one mile west of the facility. The North Branch of the Chicago River is used for recreational boating and industrial purposes including transportation and non-contact cooling water discharge (IEPA, 1992). The North Branch of the Chicago River discharges to the DesPlaines River, approximately 40 miles south of the facility (USGS, 1963).

The other surface water body in the area of the facility is Lake Michigan, located approximately nine miles east of the facility. Lake Michigan is used for recreational purposes including swimming, fishing, and boating, and for industrial purposes including transportation and industrial water supply. Lake Michigan also serves as the municipal water supply for the Village of Niles, as well as for the City of Chicago and numerous other communities in the Chicago area (NDPW, 1992a). There are no mapped wetland areas located within three miles of the facility (USGS, 1963; USDI, undated).

Surface water drainage at the facility is minimal. Storm water run-off from the parking lot drains to an approximately 2,100-square-foot storm water retention pond located in the far southwest corner of the facility. The storm water retention pond is a closed earthen basin; storm water run-off collected here eventually seeps into the underlying soil.

2.6.3 Geology and Soils

There has been no Soil Conservation Service soil mapping in the vicinity of Niles, and no information on facility-specific soil or geology was available at the time of the PA/VSI. According to regional geological sources, the facility is located near the western edge of the former Lake Chicago lacustrine plain, which is characterized by deposits of the Carmi member of the Equality Formation (Lineback, 1979). The Glenwood stage of Lake Chicago stood at an elevation of 640 feet above sea level between 13,000 and 14,000 years ago, and deposited these silty sediments on top of the existing glacial drift. The underlying drift is mapped as the Wadsworth till, deposited during the latest Wisconsinian-age glaciation. The Wadsworth till is a gray clayey or a silty clayey till (Willman, 1971). There is no information available about the drift deposits in the subsurface. The total thickness of the drift deposits is approximately 70 feet (Hughes, Kraatz, and Landon, 1966).

The uppermost bedrock unit underlying the Niles area is the Silurian-age Racine dolomite. The Racine dolomite consists of pure dolomite reefs surrounded by a silty and argillaceous, cherty, light gray dolomite containing occasional lenses of green shale. The Racine dolomite is underlain by a series of four other Silurian dolomite formations. The total thickness of the Silurian dolomites in this area is approximately 200 feet. The Ordovician-age Makoqueta Shale underlies the Silurian dolomites, and is approximately 200 feet thick. The Makoqueta Shale is underlain by several thousand feet of Ordovician-age and Cambrian-age dolomites and sandstones (Willman, 1971).

2.6.4 Ground Water

No ground water information specific to the facility was available at the time of the PA/VSI. There are no known industrial or private drinking water wells within the Village of Niles, therefore regional ground water information is limited (NDPW, 1992a). Dynamac could not locate any information concerning possible drift aquifers underlying the Wadsworth Till. The Silurian Dolomites comprise a shallow bedrock aquifer which was widely used for industrial and residential ground water supply in the past. A deep bedrock aquifer is comprised of the dolomites and sandstones underlying the Makoqueta Shale. The Makoqueta Shale serves as a confining layer above the deep bedrock aquifer (Hughes, Kraatz, and Landon, 1966). Information concerning the depth to ground water, ground-water flow direction, and hydraulic conductivities in the area was not available at the time of the VSI. Ground-water flow direction in the deep bedrock aquifer is regionally to the east (Schicht, Adams, and Stall, 1976).

2.7 RECEPTORS

The facility occupies approximately 10 acres in a predominantly industrial area in Niles, Illinois, which has a population of 28,384 persons (NDPW, 1992b). The facility is bordered on the northwest by Fort Dearborn Lithographers, on the northeast by Johnson and Quin, Inc., on the east by Lehigh Avenue, on the southeast by a Temple Steel warehouse, on the southwest by a residential area, and on the west by a Budweiser product distribution center. There are seven schools located within two miles of the facility. The nearest school, St. Mary of the Woods School, is located approximately three-quarters mile south of the facility (USGS, 1963). The entire facility is fenced; access is gained along Lehigh Avenue through a gate which is locked during non-business hours.

The nearest surface water body, the North Branch of the Chicago River, is located about one mile west of the facility (USGS, 1963). This river is used for industrial purposes including transportation, and non-contact cooling water intake and discharge, and for recreational boating. The other surface water body in the area of the facility is Lake Michigan, located approximately nine miles east of the facility. Lake Michigan is used for recreational purposes including swimming, fishing, and boating, and for industrial purposes including transportation and industrial water supply. Lake Michigan also serves as the municipal water supply for the Village of Niles, as well as for the City of Chicago and numerous other communities in the Chicago area (NDPW, 1992a).

Ground water in the area of the facility is not used as an industrial supply or drinking water source. According to Scott Jochim, Niles Department of Public Works, there are no active ground water wells in the Village of Niles (NDPW, 1992a). A release to ground water would not be likely to impact any human or environmental receptors.

There are no mapped wetlands or other sensitive environments within three miles of the facility (USGS, 1963; USDI, undated).

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac's observations. Figure 2 shows the SWMU locations.

SWMU 1

Waste Motor Oil ASTs

Unit Description: The Waste Motor Oil ASTs consist of two 300-gallon steel ASTs located indoors on a concrete floor in the oil/tire service center. The unit is used to store nonhazardous waste motor oil from oil change operations at the oil/tire service center. There are no floor drains in the area of this unit.

Date of Startup: This unit began operation in 1989.

Date of Closure: This unit is active.

Wastes Managed: This unit manages nonhazardous waste motor oil from oil change operations at the oil/tire service center. Safety-Kleen Corporation transports this waste off site to its facility in Elgin, Illinois for recycling.

Release Controls: This unit stores waste indoors in closed steel tanks on a concrete floor with no floor drains.

History of Documented Releases: No releases from this unit have been documented.

Observations: Dynamac observed the two steel ASTs in the concrete-floored oil/tire service center. Both ASTs and the concrete floor appeared to be in sound condition (See Photo Nos. 1 and 2). There were no visible stains or evidence of a previous release in the area of this unit.

SWMU 2

Used Tire Storage Area

Unit Description: The Used Tire Storage Area consists of a 200-square-foot portion of asphalt located outside along the south side of the building at the facility. The unit is surrounded by a six-foot chain-link fence and is used to store used tires from tire change operations at the oil/tire service center directly on the asphalt surface. There are no drains in the area of this unit.

Date of Startup: This unit began operation in 1989.

Date of Closure: This unit is active.

Wastes Managed: This unit manages used tires from tire change operations at the oil/tire service center. Southwest Tires, Inc., transports the used tires off site to its facility in Chicago, Illinois.

Release Controls: This unit is surrounded by a six-foot chain-link fence and is located outdoors on a portion of the asphalt parking lot at the facility. There are no other release controls associated with this unit.

History of Documented Releases: No releases from this unit have been documented.

Observations: This unit contained approximately 1,200 cubic feet of used tires at the time of the VSI (See Photo No. 3). The gate of the fence surrounding the unit was locked. The asphalt in the area of this unit appeared to be in sound condition. Dynamac did not observe any drains in the area of this unit.

SWMU 3

Used Cardboard Storage Area

Unit Description: The Used Cardboard Storage Area consists of a portion of asphalt measuring approximately 300 square feet located fifteen feet south of the Used Tire Storage Area (SWMU 2), along the south side of the building at the facility. The unit stores used cardboard from warehouse operations on wood pallets on the asphalt surface. There are no drains in the area of this unit.

Date of Startup: This unit began operation in approximately 1983.

Date of Closure: This unit is active.

Wastes Managed: This unit manages used cardboard from warehouse operations at the facility. C and N Salvage transports this waste off site to its facility in Northbrook, Illinois for recycling.

Release Controls: This unit is located outdoors on a portion of the asphalt parking lot at the facility. There are no other release controls associated with this unit.

History of Documented Releases: No releases from this unit have been documented.

Observations: Dynamac observed approximately 15 cubic yards of used cardboard in this unit at the time of the VSI (See Photo No. 4). The asphalt in the area of this unit appeared to be in sound condition. Dynamac did not observe any drains in the area of this unit.

SWMU 4

Former Container Storage Area

Unit Description: The Former Container Storage Area was identified on the facility's original Part A as a 260-square-foot area located outside in the southwest corner of the facility. According to the Part A, this unit had a storage capacity of 3,300 gallons. The facility used this unit to store spent solvent (F001) and paint waste (D001, D008) in 55-gallon drums. There was no further description of the unit on the Part A, or in EPA or IEPA files at the time of the VSI.

Date of Startup: The date of startup for this unit was prior to 1980.

Date of Closure: This unit has been inactive since 1982. IEPA approved RCRA closure of this unit in 1983.

Wastes Managed: According to the Part A, this unit managed spent solvent (F001) and paint waste (D001, D008). There was no information in EPA or IEPA files indicating the final disposition of these wastes or whether the facility stored any other wastes in this unit.

Release Controls: This unit managed waste outdoors. During a 1982 IEPA inspection at the facility, IEPA did not record any violations concerning this unit. File information did not indicate if there were any other release controls associated with this unit. At the time of the VSI, this area of this unit was covered by an asphalt parking lot.

History of

Documented Releases: No releases from this unit have been documented.

Observations: This unit was inactive at the time of the VSI. The asphalt in the area of this unit was cracked and patched. There were no visible stains or evidence of previous releases in the area of this unit (See Photo No. 5).

SWMU 5**Former Scrap Metal Hoppers**

Unit Description: According to Mr. Liedtke, the former CHC - LPD facility managed scrap steel and aluminum in several hoppers located outdoors. Mr. Liedtke could not recall how many hoppers the facility used to manage these wastes, or whether the hoppers were located along the south or west sides of the building at the facility (CHC, 1992). There was no information regarding this unit in EPA or IEPA files at the time of the VSI.

Date of Startup: The date of startup for this unit was not available in EPA or IEPA files at the time of the VSI. Mr. Liedtke stated the former CHC - LPD facility used this unit prior to 1980 (CHC, 1992).

Date of Closure: This unit has been inactive since at least 1983.

Wastes Managed: This unit managed scrap steel and aluminum from machining and fabricating operations. There was no information available in EPA or IEPA files at the time of the PA/VSI regarding the final disposition of this waste.

Release Controls: This unit managed waste outdoors in steel hoppers. There was no information available in EPA or IEPA files at the time of the VSI pertaining to this unit. Mr. Liedtke could not recall if there were any other release controls associated with this unit (CHC, 1992).

History of Documented Releases: No releases from this unit have been documented.

Observations: This unit was no longer in use and was not present at the time of the VSI. Mr. Liedtke could not recall if the unit was formerly located along the south or west sides of the building at the facility (CHC, 1992). Dynamac walked along both sides of the facility, and did not observe any remnants of scrap metal or any evidence of the former location of this unit.

4.0 AREAS OF CONCERN

Dynamac identified no AOCs during the PA/VSI.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and no AOCs at the former CHC - LPD facility. Background information on the facility's location; operations; waste generation and management; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. Following are Dynamac's conclusions and recommendations for each SWMU. Table 3, located at the end of this section, summarizes the SWMUs at the facility and the recommended further actions.

SWMU 1

Waste Motor Oil ASTs

Conclusions:

The Waste Motor Oil ASTs consist of two 300-gallon steel ASTs in sound condition located on a concrete floor with no visible cracks or stains. The unit is used to store nonhazardous waste motor oil from oil change operations at the oil/tire service center. There are no floor drains in the area of this unit. No releases from this unit have been documented.

Due to the release controls described above, the potential for a release from this unit to ground water, surface water, air, and on-site soils is low.

Recommendations: Dynamac recommends no further action at this time.

SWMU 2

Used Tire Storage Area

Conclusions:

The Used Tire Storage Area consists of a fenced, 200-square-foot portion of asphalt with no visible cracks. This unit is used to store used tires from tire change operations at the oil/tire service center directly on the asphalt surface. Dynamac did not observe any drains in this area at the time of the VSI. No releases from this unit have been documented.

Due to the release controls described above, the potential for a release from this unit to ground water, surface water, air, and on-site soils is low.

Recommendations: Dynamac recommends no further action at this time.

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SWMU 3 Used Cardboard Storage Area

Conclusions: The Used Cardboard Storage Area consists of a 300-square-foot portion of asphalt with no visible cracks. The facility stores the used cardboard on wood pallets on the asphalt surface. Dynamac did not observe any drains in this area during the VSI. No release from this unit have been documented.

Due to the release controls described above, the potential for a release from this unit to ground water, surface water, air, and on-site soils is low.

Recommendations: Dynamac recommends no further action at this time.

SWMU 4 Former Container Storage Area

Conclusions: The Former Container Storage Area was identified on CHC's original Part A as a 260-square-foot area located in the southwest corner of the facility. According to the Part A, this unit had a storage capacity of 3,300 gallons; the facility used this unit to store spent solvent (F001) and paint waste (D001, D008). There was no further description of the unit on the Part A, or in EPA or IEPA files at the time of the VSI.

Because this unit has been inactive since 1982 and underwent IEPA-approved RCRA closure in 1983, the potential for a historical or future release to ground water, surface water, air, and on-site soils is low.

Recommendations: Dynamac recommends no further action at this time.

SWMU 5 Former Scrap Metal Hoppers

Conclusions: According to Mr. Liedtke, the former CHC - LPD facility managed scrap steel and aluminum in several hoppers located outdoors. Mr. Liedtke could not recall any other details regarding the facility's use of this unit (CHC, 1992). There was no information regarding this unit in EPA or IEPA files at the time of the VSI.

Because the unit has been inactive since 1983 and managed only nonhazardous solid scrap metal, the potential for a historical or future release to the ground water, surface water, air, and on-site soils is low.

Recommendations: Dynamac recommends no further action at this time.

RELEASED

DATE

RIN #

INITIALS

ENFORCEMENT
CONFIDENTIAL

TABLE 3
SWMU SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Waste Motor Oil ASTs	1989 to present	None	None
2. Used Tire Storage Area	1989 to present	None	None
3. Used Cardboard Storage Area	1983 to present	None	None
4. Former Container Storage Area	Prior to 1980 to 1983	None	None
5. Former Scrap Metal Hoppers	Prior to 1980 to 1983	None	None

RELEASED
DATE
RIN #
INITIALS

REFERENCES

- Crouse-Hinds Company (CHC), 1980a. Notification of Hazardous Waste Activity (Notification) for the former CHC - Lighting Products Division (LPD) facility, August 14.
- CHC, 1980b. Subsequent Notification for the facility, October 31.
- CHC, 1980c. RCRA Part A Permit Application, November 14.
- CHC, 1982. Letter to the Illinois Environmental Protection Agency (IEPA) containing information to satisfy violations from a February 5, 1982 IEPA inspection at the facility from Richard Walker, Facility Manager, CHC - LPD, May 28.
- CHC, 1992. Telephone conversation between Steven Liedtke, CHC, and Deborah Hall, Dynamac Corporation (Dynamac), regarding past operations and waste generation at the former CHC - LPD facility, June 3.
- CHC, undated. Closure Plan and Cost Estimate for Hazardous Waste Storage Area at the facility.
- Federal Emergency Management Agency (FEMA), 1979. Flood Insurance Rate Map, Village of Niles, Illinois, June 15.
- Hughes, G., P. Kraatz, and R. Landon, 1966. "Bedrock Aquifers of Northeastern Illinois," Illinois State Geological Survey, circular 406.
- IEPA, 1978. Air Permit No. 04120023 issued to the facility for the manufacturing plant, expiration date June 8, 1982, on June 28.
- IEPA, 1981. Air Permit No. 74120023 issued to the facility for two oil/natural gas boilers, expiration date December 31, 1982, on June 4.
- IEPA, 1982. Observation Report for the facility written by G.J.S., IEPA, February 5.
- IEPA, 1983. Letter to CHC regarding IEPA approval of closure activities at the facility from Lawrence Eastep, IEPA, November 7.
- IEPA, 1992. Telephone conversation between Robert Sulski, IEPA, and Deborah Hall, Dynamac, regarding surface water use in the Chicago area, March 30.
- Lineback, 1979. Quaternary Deposits in Illinois, Map 1:500,000.

REFERENCES (continued)

- Metcalf & Eddy, Inc. (Metcalf), 1983. Certification of Closure of the facility's Hazardous Waste Storage facility on March 31, 1983, Jerald Gers, Metcalf, April 4.
- National Oceanic and Atmospheric Administration (NOAA), 1979. Climatic Atlas of the U.S., Ashville, NC.
- NOAA, 1990. Local Climatological Data for O'Hare International Airport, Illinois.
- Niles Department of Public Works (NDPW), 1992a. Telephone conversation between Scott Jochim and Deborah Hall, Dynamac, regarding drinking water sources for the Village of Niles, June 23.
- NDPW, 1992b. Telephone conversation between Management Office and Deborah Hall, Dynamac Corporation (Dynamac), regarding population of the Village of Niles, June 23.
- Schicht, Richard J., J. Roger Adams, and John B. Stall, 1976. Water Resources Availability, Quality, and Cost in Northeastern Illinois.
- U.S. Department of the Interior (USDI), undated. National Wetlands Inventory Map, 1:24,000 scale, Park Ridge, Illinois Quadrangle.
- U.S. Geological Survey (USGS), 1963. 7.5 Minute Series Topographic Map, Park Ridge, Illinois Quadrangle, 1:24,000, Photorevised 1972.
- Willman, 1971. "Summary of the Geology of the Chicago Area," Illinois State Geological Survey.

ATTACHMENT A
EPA PRELIMINARY ASSESSMENT FORM
2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE
IL

02 SITE NUMBER
ILD04930158B

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site)

Crouse-Hinds Company - Lighting Products
Division

02 STREET, ROUTE NO. OR SPECIFIC LOCATION IDENTIFIER

7420 Lehigh Avenue

03 CITY

Niles

04 STATE

IL

05 ZIP CODE

60648

06 COUNTY

Cook

07 COUNTY

CODE

08 CONG

DIST

09 COORDINATES: LATITUDE

42 00' 59''

LONGITUDE

87 46' 35''

10 DIRECTIONS TO SITE (Starting from nearest public road)

Gross Point Road to Lehigh Avenue south. South approximately one-third mile,
facility is located on the right-hand side.

III. RESPONSIBLE PARTIES

01 OWNER (If known)

Warehouse Club, Inc.

02 STREET (Business, mailing, residential)

7235 N. Linder Avenue

03 CITY

Skokie

04 STATE

IL

05 ZIP CODE

60077

06 TELEPHONE NUMBER

(708) 679-6800

07 OPERATOR (If known and different from owner)

Warehouse Club, Inc.

08 STREET (Business, mailing, residential)

7420 Lehigh Avenue

09 CITY

Niles

10 STATE

IL

11 ZIP CODE

60648

12 TELEPHONE NUMBER

(708) 647-1323

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE

☐ B. FEDERAL:

(Agency Name)

☐ C. STATE

☐ D. COUNTY

☐ E. MUNICIPAL

☐ F. OTHER

(Specify)

☐ G. UNKNOWN

OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 3010 DATE RECEIVED: 08 / 14 / 80

MONTH DAY YEAR

☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED:

MONTH DAY YEAR

☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION

BY (Check all that apply)

☒ YES

DATE 06/22/92

☐ NO

☐ A. EPA

☒ B. EPA CONTRACTOR

☐ C. STATE

☐ D. OTHER CONTRACTOR

☐ E. LOCAL HEALTH OFFICIAL

☐ F. OTHER:

(Specify)

CONTRACTOR NAME(S): Dynamac Corporation

02 SITE STATUS (Check one)

☒ A. ACTIVE

☐ B. INACTIVE

☐ C. UNKNOWN

03 YEARS OF OPERATION

1960s present

BEGINNING YEAR ENDING YEAR

☐ UNKNOWN

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Nonhazardous waste oil, used tires.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

There are no known potential hazards to the environment or population.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents.)

☐ A. HIGH

(Inspection required promptly)

☐ B. MEDIUM

(Inspection required)

☒ C. LOW

(Inspect on time-available basis)

☐ D. NONE

(No further action needed; complete current disposition form)

VI. INFORMATION AVAILABLE FROM

CONTACT

Kevin Pierard

02 OF (Agency/Organization)

U.S. EPA

03 TELEPHONE NUMBER

(312) 386-4448

04 PERSON RESPONSIBLE FOR ASSESSMENT

Deborah Hall
Russ Crittenden

05 AGENCY

06 ORGANIZATION

Dynamac Corp.

07 TELEPHONE NUMBER

(312) 466-0222

08 DATE

06 22 92

MONTH DAY YEAR

ATTACHMENT B
VISUAL SITE INSPECTION
SUMMARY AND
PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Former Crouse-Hinds Company - Lighting Products Division Facility
7420 Lehigh Avenue
Niles, Illinois
ILD 049 301 583

Date: June 22, 1992

Facility Representative: Chris Prucnal, Facility Manager, Warehouse Club, Inc.

Representative Telephone No.: (708) 647-1323

Inspection Team: Russ Crittenden, Dynamac Corporation
Deborah Hall, Dynamac Corporation

Photographer: Deborah Hall, Dynamac Corporation

Weather Conditions: Sunny; about 60° F

Summary of Activities: The visual site inspection (VSI) began at 10:00 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Mr. Prucnal then discussed the facility's past and current operations, solid wastes generated, and release history.

The VSI tour began at 10:25 a.m.. The tour began at the oil/tire service center where Dynamac observed two Waste Motor Oil ASTs (SWMU 1). The inspection team then walked along the south side of the building, just outside the oil/tire service center. Here, Dynamac observed both the Used Tire Storage Area (SWMU 2) and the Used Cardboard Storage Area (SWMU 3). The inspection team proceeded to the southwest corner of the facility, where Dynamac observed the Former Outdoor Container Storage Area (SWMU 4). The Former Scrap Metal Hoppers (SWMU 5) were formerly located along either the south or west side of the

Visual Site Inspection Summary
Former Crouse-Hinds - Lighting
Products Division Facility
Page 2

building at the facility but are no longer present. The inspection team walked along both sides of the building, but did not observe any scrap metal remnants or evidence indicating the unit was formerly located along either side.

The tour concluded at 10:40 a.m., after which the inspection team held an exit meeting with Mr. Prucnal. The VSI was complete and the inspection team left the facility at 10:50 a.m.

PHOTOGRAPHS

**FORMER CROUSE-HINDS COMPANY -
LIGHTING PRODUCTS DIVISION FACILITY
NILES, ILLINOIS**

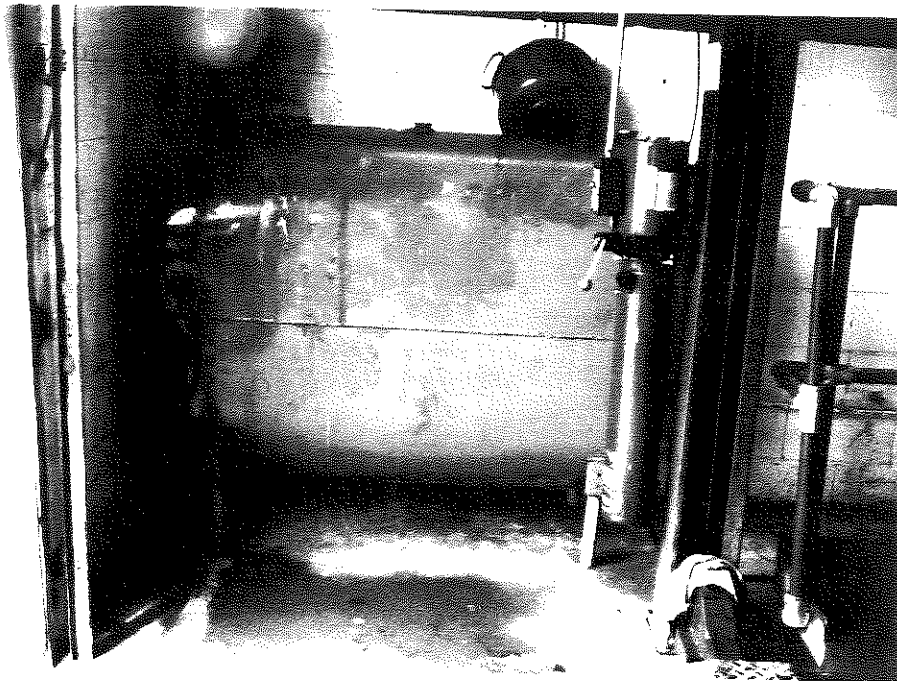


Photo No.: 1
 Orientation: Northwest
 Description: One of two 300-gallon steel Waste Oil aboveground storage tanks (AST) located inside the oil/tire service center.

Location: SWMU 1

Date: June 22, 1992

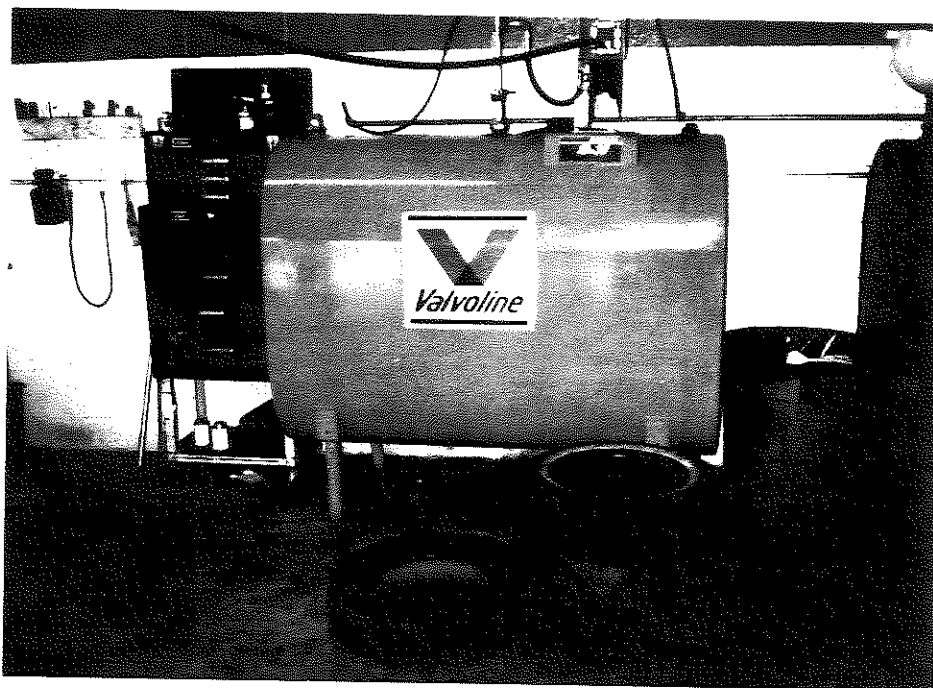


Photo No.: 2
 Orientation: North
 Description: The second of two 300-gallon steel Waste Oil ASTs located in the oil/tire service center.

Location: SWMU 1

Date: June 22, 1992

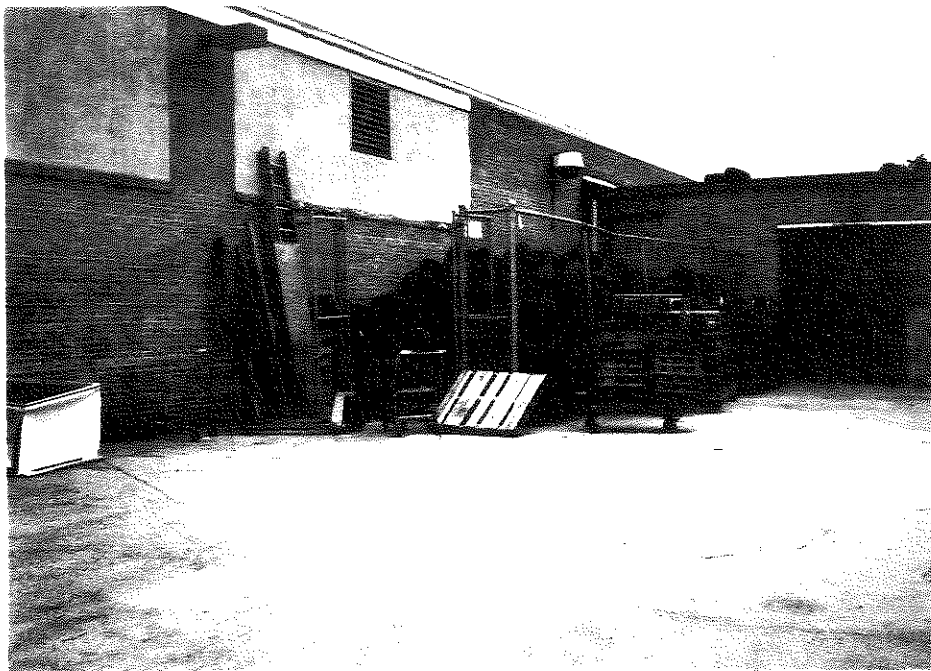


Photo No.: 3
 Orientation: Northeast
 Description: The Used Tire Storage Area located along the south side of the building, just outside the oil/tire service center.

Location: SWMU 2
 Date: June 22, 1992

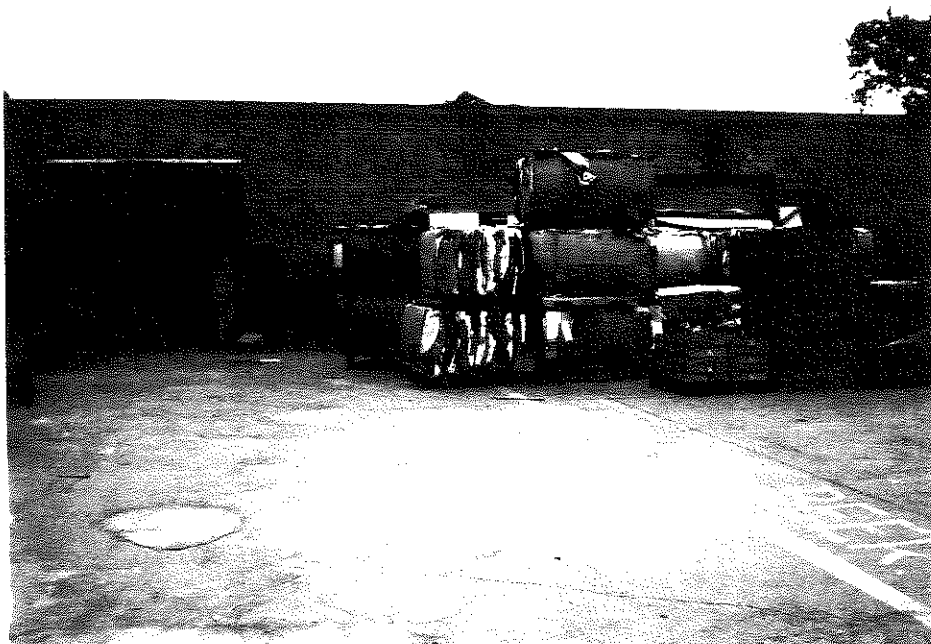


Photo No.: 4
 Orientation: East
 Description: The Used Cardboard Storage Area located along the south side of the building, just south of the Used Tire Storage Area (SWMU 2).

Location: SWMU 3
 Date: June 22, 1992



Photo No.: 5

Location: SWMU 4

Orientation: West

Date: June 22, 1992

Description: Southwest corner of the facility, where the Former Container Storage Area was located prior to 1982. Note the storm water retention pond in rear of photo.

END OF PHOTOGRAPHS

ATTACHMENT C
VISUAL SITE INSPECTION
FIELD NOTES

June 22, 1992

20

Warehouse Club - Former Crouse-Hinds factory

Inspectors

Arrival 10:00 AM

Russ Crimenden

Deborah Hall

Met with Chris Prucnal, General Manager

Discussed present operations and purpose of visit. Facility generates waste oil, cardboard, general trash. Cardboard recycled. Oil sent to Safety-Kleen once a week - 450 gallons per week from automotive service center. (Elgin Safety-Kleen recycles it). Operations include general warehouse plus auto service (lube, ~~trans~~^{oil}, tires). Photos 1 & 2 of oil storage tanks (300 gal/tank) started this in 1989 (oil change). Photo 3 of tire storage area - 20' x 10' tires sent to Southwest Tire, Chicago. Cardboard CNA salvage, Northbrook. Photo 4 - Old drum storage area. 150 employees, since 1983. Left facility at 10:50 AM.

Russ Crimenden
6/22/92



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

June 8, 1992

HRE-8J

Dick Palmer
Vice President of Operations
Warehouse Club
7235 North Linder Avenue
Skokie, Illinois 60077

Re: Visual Site Inspection
Former Location,
Crouse-Hinds Company -
Lighting Products Division
Chicago, Illinois
ILD 049 301 583

Dear Mr. Palmer:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of units at the facility and the waste management practices used.

June 8, 1992

Page two

The VSI has been scheduled for June 1992. The inspection team will consist of Joseph Weslock and Deborah Hall of Dynamac Corporation, contractors for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the Conclusions and Executive Summary portions, will be sent when the report is available.

Sincerely yours,



for Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

attachment

cc: Larry Eastep, Permit Section, IEPA

ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- o RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators and underground injection wells
- o Closed and abandoned units
- o Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- o Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or a nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.